

This document provides pertinent information concerning the reissuance of the VPDES Permit listed below. This permit is being processed as a minor, industrial permit. The discharge results from a below-grade parking garage dewatering system. This permit action consists of updating the proposed effluent limits to reflect the current Virginia Water Quality Standards (effective 6 January 2011) and updating permit language as appropriate. The effluent limitations and special conditions contained within this permit will maintain the Water Quality Standards of 9VAC25-260 et seq.

- | | | | | |
|----|------------------------------------|---|-------------------|---|
| 1. | Facility Name and Mailing Address: | John Marshall III Site
8251 Greensboro Drive, B100
McLean, VA 22102 | SIC Code: | 6512
Operators of Nonresidential Buildings |
| | Facility Location: | 8285 Greensboro Drive
McLean, VA 22102 | County: | Fairfax |
| | Facility Contact Name: | Tim Incheck / Associate Vice President | Telephone Number: | 703-902-6666 |
| | Facility Email Address: | tim.incheck@dtz.com | | |
| 2. | Permit No.: | VA0090093 | Expiration Date: | 7 March 2015 |
| | Other VPDES Permits: | Not Applicable | | |
| | Other Permits: | Not Applicable | | |
| | E2/E3/E4 Status: | Not Applicable | | |
| 3. | Owner Name: | Marshall Property, LLC | | |
| | Owner Contact / Title: | Tim Incheck / Associate Vice President | Telephone Number: | 703-902-6666 |
| | Owner Email Address: | tim.incheck@dtz.com | | |
| 4. | Application Complete Date: | 8 December 2014 | | |
| | Permit Drafted By: | Douglas Frasier | Date Drafted: | 15 July 2015 |
| | Draft Permit Reviewed By: | Anna Westernnik | Date Reviewed: | 16 July 2015 |
| | Draft Permit Reviewed By: | Alison Thompson | Date Reviewed: | 30 July 2015 |
| | Public Comment Period: | Start Date: 19 September 2015 | End Date: | 19 October 2015 |
| 5. | Receiving Waters Information: | See Attachment 1 for the Flow Frequency Determination. | | |
| | Receiving Stream Name: | Old Courthouse Spring Branch, UT | Stream Code: | 1aXNW |
| | Drainage Area at Outfall: | < 0.01 square miles* | River Mile: | 0.43 |
| | Stream Basin: | Potomac River | Subbasin: | Potomac River |
| | Section: | 9 | Stream Class: | III |
| | Special Standards: | None | Waterbody ID: | VAN-A11R |
| | 7Q10 Low Flow: | 0.0 MGD | 7Q10 High Flow: | Not Applicable** |
| | 1Q10 Low Flow: | 0.0 MGD | 1Q10 High Flow: | Not Applicable** |
| | 30Q10 Low Flow: | 0.0 MGD | 30Q10 High Flow: | Not Applicable** |
| | Harmonic Mean Flow: | 0.0 MGD | 30Q5 Flow: | Not Applicable** |

*The drainage area has been updated based on the current Planning Statement found in Attachment 11. Critical flows are not affected as the drainage area is still considered rather small.

**The flow within the receiving streams would be highly variable; dependent upon the previous precipitation event, amount/type of precipitation and longevity of the event. A mixing zone determination is not feasible.

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6. Statutory or Regulatory Basis for Special Conditions and Effluent Limitations:

<input checked="" type="checkbox"/> State Water Control Law	<input checked="" type="checkbox"/> EPA Guidelines
<input checked="" type="checkbox"/> Clean Water Act	<input checked="" type="checkbox"/> Water Quality Standards
<input checked="" type="checkbox"/> VPDES Permit Regulation	<input type="checkbox"/> Other:
<input checked="" type="checkbox"/> EPA NPDES Regulation	

7. Licensed Operator Requirements: Not Applicable

8. Reliability Class: Not Applicable

9. Facility / Permit Characterization:

<input checked="" type="checkbox"/> Private	<input checked="" type="checkbox"/> Effluent Limited	<input type="checkbox"/> Possible Interstate Effect
<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> Water Quality Limited	<input type="checkbox"/> Compliance Schedule
<input type="checkbox"/> State	<input type="checkbox"/> Whole Effluent Toxicity Program	<input type="checkbox"/> Interim Limits in Permit
<input type="checkbox"/> Water Treatment Plant	<input type="checkbox"/> Pretreatment Program	<input type="checkbox"/> Interim Limits in Other Document
<input type="checkbox"/> eDMR Participant	<input type="checkbox"/> Total Maximum Daily Load (TMDL)	

10. Wastewater Sources and Treatment Description:

The John Marshall III Site is located at Tysons Corner in McLean, Virginia. This intermittent discharge results from a below-grade office building parking garage dewatering system.

BACKGROUND

Prior to construction, groundwater samples collected from monitoring wells at the John Marshall III Site in July and August 1998 were found to contain low levels of volatile organic compounds (VOCs). The source of these VOCs were thought to originate from contaminated soils on the Fletcher Estate; an adjacent property south of the John Marshall III Site. Historic operation of a transmission and auto repair service station on this site may have contaminated the soils and eventually the groundwater with industrial solvents. Subsurface investigations indicated that the groundwater flows in a parallel direction to the property line between the John Marshall III Site and the Fletcher Estate.

In order to mitigate conceivable impacts, the John Marshall III Site installed a retaining wall of steel panels, deep into the ground along the perimeter and the property line between the two parcels in order to avert the contamination plume migrating from the Fletcher Estate. The heirs of the Fletcher Estate entered into the Voluntary Remediation Program (VRP) with the project subsequently considered complete on 25 September 2002; however, there were restrictions placed on groundwater use.

The John Marshall III Site initially discharged to the Fairfax County sanitary sewer, but began discharging to the County storm sewer system once the VPDES permit was issued in 1999 and permission was obtained to discharge to the storm sewer. The storm sewer conveyance terminates and discharges to Old Courthouse Spring Branch, a tributary to Wolftrap Creek which drains to Difficult Run. Difficult Run discharges into the Potomac River.

Groundwater remediation at the John Marshall III Site currently consists of an air stripper/carbon filters which has been operational since the start of construction. The air stripper is designed to remove a minimum of 90% of VOCs found in the groundwater. It should be noted that during a site visit by DEQ staff on 2 July 2015, it was discovered that only the south end of the parking garage dewatering system is routed through the treatment unit while the north end is not (**Attachment 2**); however, both eventually leave/terminate the site at the same location. It is believed that the contaminated plume had not migrated that far north, resulting in negative analytical results during initial construction; thus, treatment was not required for the north side dewatering operations.

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June 2007 – May 2009 influent data indicates that all monitored pollutants, excluding Trichloroethylene (TCE), were found below quantification levels (see **Attachment 3**). With the exception of seven sampling events, influent TCE concentrations were typically found below the current Water Quality Criteria of 300 µg/L for all surface waters. TCE has a high Henry's Law Constant; which basically states the solubility of a gas in a liquid is directly proportional to the partial pressure of the gas above the liquid. Consequently, TCE does not exist naturally in the environment; thus, negating the partial pressure portion of the aforementioned Law. A high Henry's Constant value equates to a predisposition for rapid evaporation from water. Half-lives of evaporation have been reported to be on the order of several minutes to hours, depending upon the turbulence incurred. Field studies further confirmed this physical property.

In addition to the aforementioned sampling data, the permittee demonstrated the effects of Henry's Law and natural attenuation (volatilization) that would occur within the conveyance system without treatment prior to the discharge entering the receiving stream. **Attachment 4** is a copy of the exercise conducted in July 2009. The result revealed that over 66% of TCE evaporated a relatively short distance, approximately 50 feet, downgradient from the current Outfall 001 location. Recall that the current air stripper is designed for ≥ 90% removal rate. TCE removal occurs merely by the dewatering operations; resulting in a removal rate equal to 2/3 of the air stripper design prior to leaving the site.

Based on the aforementioned discussion, it is staff's best professional judgement that the outfall may be relocated downstream of the current location to a point prior to exiting the site. The permittee will be required to submit for DEQ-NRO approval the proposed outfall relocation (see Section 21.e.) in order to demonstrate compliance with the Water Quality Standards for all pollutants of concern, regardless of treatment, prior to the discharge entering the onsite stormwater best management practice (BMP). This BMP consists of riprap which allows for aeration and some filtration prior to entering the stormwater conveyance system (see **Attachment 5**). There is approximately 50 feet between the outlet pipe for the dewatering system and the stormwater basin riser. The distance between the point of entry into the storm drain within the BMP and the receiving stream is approximately 0.4 miles (see **Attachment 6**).

See **Attachment 7** for the NPDES Permit Rating Worksheet.

See **Attachment 8** for a facility schematic/diagram.

TABLE 1 CURRENT OUTFALL DESCRIPTION				
Number	Discharge Sources	Treatment	Maximum 30-day Flow	Latitude / Longitude
001	Groundwater	See Section 10	Dependent upon groundwater intrusion rate	38° 55' 17" / 77° 14' 18"
See Attachment 9 for the Falls Church topographic map.				

11. Solids Treatment and Disposal Methods:

The facility does not generate nor treat domestic sewage sludge.

12. Other Permitted Discharges Located Within Waterbody VAN-A11R:

TABLE 2 PERMITTED DISCHARGES			
Permit Number	Facility Name	Type	Receiving Stream
VA0024121	The Maderia School	Municipal Discharge Individual Permit	Difficult Run, UT
VA0091995	Reston Lake Anne Air Conditioning Corp	Industrial Discharge Individual Permit	Lake Anne
VAG406098	Gorark Residence	Small Municipal ≤ 1,000 gpd General Permit	Bullneck Run, UT

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TABLE 2 (continued)			
Permit Number	Facility Name	Type	Receiving Stream
VAG750193	Avis Rent A Car	Car Wash General Permit	Scott Run, UT
VAG830246	Vienna 226 Maple Venture, LLC	Petroleum Contamination General Permit	Piney Branch
VAG830381	Reston Community Center		Snakeden Branch
VAG830477	Exxon 26140		Captain Hickory Run, UT
VAG830479	Spring Hill Station Land Bay 2DA		Rocky Run, UT

13. Material Storage:

There are no chemicals utilized or stored at this facility.

14. Site Inspection:

Performed by NRO Permitting and Compliance Staff on 23 October 2008. A subsequent visit was conducted on 2 July 2015 by DEQ-NRO Permitting and Planning staff. Relevant information obtained and not reflected in the 2008 inspection was noted in Section 10 of this Fact Sheet. Treatment unit and operations have not changed.

Refer to **Attachment 10** for the 2008 inspection report.

15. Receiving Stream Water Quality and Water Quality Standards:**a. Ambient Water Quality Data**

This facility discharges into an unnamed tributary to Old Courthouse Spring Branch (storm sewer), which has not been monitored or assessed. There is a biological monitoring station, 1aOCS000.43, located on Old Courthouse Spring Branch, at Laurel Hill Road, approximately 2.1 miles downstream of Outfall 001. Routine ambient water quality monitoring was not conducted in conjunction with the biological sampling. The biological monitoring found benthic macroinvertebrate impairments, resulting in an impaired classification for the aquatic life use.

The fish consumption, recreation and wildlife uses were not assessed.

There is a downstream DEQ ambient monitoring station located on Wolftrap Creek. Station 1aWOT000.92 is located at the Route 702 bridge crossing, approximately 4.3 miles downstream of Outfall 001. The following is the water quality summary for this segment of Wolftrap Creek, as taken from the 2012 Integrated Report:

Class III, Section 9.

DEQ monitoring station located in this segment of Wolftrap Creek: Ambient water quality monitoring station 1aWOT000.92, at Route 702

E. coli monitoring finds a bacterial impairment, resulting in an impaired classification for the recreation use. This impairment is nested within the downstream completed bacteria TMDL for Difficult Run.

The aquatic life is considered fully supporting. However, from a previous assessment, citizen monitoring stations found a medium probability of adverse conditions for biota, resulting in an observed effect for the aquatic life use. This observed effect will remain.

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The wildlife use is considered fully supporting.

The fish consumption use was not assessed.

b. 303(d) Listed Stream Segments and Total Maximum Daily Loads (TMDLs)

TABLE 3 DOWNSTREAM 303(d) IMPAIRMENTS AND TMDLs					
Waterbody Name	Impaired Use	Cause	TMDL Completion/Schedule	WLA	Basis for WLA
<i>Impairment Information in the 2012 Integrated Report</i>					
Old Courthouse Spring Branch	Aquatic Life	Benthic Macroinvertebrates	2022	--	--
Wolftrap Creek	Recreation	<i>E. coli</i>	Difficult Run Bacteria 7 November 2008	None	Not expected to discharge pollutant
Difficult Run	Fish Consumption	PCBs	2018	--	--
		Heptachlor epoxide	2018	--	--
	Aquatic Life	Benthic Macroinvertebrates	Difficult Run Benthic 7 November 2008	None	Not expected to discharge pollutant

The planning statement may be located in **Attachment 11**.

c. Receiving Stream Water Quality Criteria

Part IX of 9VAC25-260(360-550) designates classes and special standards applicable to defined Virginia river basins and sections. The receiving stream, an unnamed tributary to Old Courthouse Spring Branch, is located within Section 9 of the Potomac River Basin and classified as Class III water.

At all times, Class III waters must achieve a dissolved oxygen (D.O.) of 4.0 mg/L or greater, a daily average D.O. of 5.0 mg/L or greater, a temperature that does not exceed 32° C and maintain a pH of 6.0 – 9.0 standard units (S.U.).

The 7Q10 and 1Q10 critical flows of the receiving stream have been determined to be 0.0 MGD. In cases such as this, effluent pH and temperature data may be utilized to establish water quality criteria. Staff utilized the temperature values provided in the permit application, the 90th percentile of all reported effluent pH data from Discharge Monitoring Reports and a default value of 50 mg/L CaCO₃ for hardness to calculate the water quality criteria.

Attachment 12 details water quality criteria applicable to this receiving stream. It should be noted that the discharge flow utilized for these calculations is based on the maximum treatment capability of the current system. However, reported flows are typically less than half of the maximum design flow of the air stripper.

d. Receiving Stream Special Standards

The State Water Control Board's Water Quality Standards, River Basin Section Tables (9VAC25-260-360, 370 and 380) designates the river basins, sections, classes and special standards for surface waters of the Commonwealth of Virginia. The receiving stream, Old Courthouse Spring Branch, is located within Section 9 of the Potomac River Basin. This section has not been designated with a special standard.

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16. Antidegradation (9VAC25-260-30):

All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect these uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The receiving stream has been classified as Tier 1 based on the surrounding, highly urbanized development, critical stream 7Q10 and 1Q10 flow values of 0.0 MGD and noted downstream impairments and TMDLs. It is staff's best professional judgment that such streams are Tier 1 since the limits and monitoring requirements are set to maintain the Water Quality Standards. The proposed permit limits and monitoring requirements have been established by determining wasteload allocations which will result in attaining and/or maintaining all water quality criteria applicable to the receiving stream, including narrative criteria. These wasteload allocations will provide for the protection and maintenance of all existing uses.

17. Effluent Screening, Wasteload Allocation, and Effluent Limitation Development:

To determine water quality-based effluent limitations for a discharge, the suitability of data must first be determined. Data is suitable for analysis if one or more representative data points are equal to or above the quantification level ("QL") and the data represent the exact pollutant being evaluated.

Next, the appropriate Water Quality Standards (WQS) are determined for the pollutants in the effluent. Then, the Wasteload Allocations (WLAs) are calculated. In this case, since all critical stream flows have been determined to be zero, the WLAs are equal to the WQS. The WLA values are then compared with available effluent data to determine the need for effluent limitations. Effluent limitations are needed if the 97th percentile of the daily effluent concentration values is greater than the acute wasteload allocation or if the 97th percentile of the four-day average effluent concentration values is greater than the chronic wasteload allocation. Effluent limitations are based on the most limiting WLA, the required sampling frequency and statistical characteristics of the effluent data.

a. Effluent Screening

Effluent data obtained from June 2010 – March 2014 Discharge Monitoring Reports (DMRs) and the reissuance application has been reviewed and determined to be suitable for evaluation. Please refer to **Attachment 13** for a summary of effluent data.

b. Effluent Limitations, Outfall 001 – Toxic Pollutants

9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an instream excursion of water quality criteria. Those parameters with WLAs that are near effluent concentrations are evaluated for limits.

The VPDES Permit Regulation at 9VAC25-31-230.D requires that monthly and weekly average limitations be imposed for continuous discharges from POTWs and monthly average and daily maximum limitations be imposed for all other continuous non-POTW discharges.

The *General VPDES Permit Regulation for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests*, 9VAC25-120 et seq., includes wastewaters from sites contaminated by chlorinated hydrocarbon solvents. Limitations, as set forth, were either based upon the pollutant toxicity (human or aquatic) and the best available technology. Generally, permitting staff will propose limitations that are found in other regulations for facilities that are similar in regard to treatment, type of pollutants and/or receiving waters.

However, the permittee submitted influent data indicating that all constituents, excluding Trichloroethylene (TCE), were found below detectable levels and has requested that the current treatment system be taken offline based upon this information. To further substantiate that treatment may no longer be warranted; as noted in Section 10 (**Attachment 4**), the permittee demonstrated that attenuation (volatilization) of untreated effluent occurs within the dewatering system prior to leaving the site and entering the receiving stream and that the Water Quality Standard for TCE would not be violated. These results indicate that volatilization does readily occur and at conceivable rates, significantly reducing the pollutant levels prior to the receiving stream.

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After thorough review and consideration of the influent data, demonstration study and the possible removal of treatment, it is staff's best professional judgement that effluent limitations equal to the Water Quality Standard for each respective pollutant are warranted. If treatment is removed, limitations are then necessary to ensure water quality of the receiving stream is protected at all times. The outfall may be moved downstream of the current sampling location to allow TCE attenuation to occur within the dewatering system prior to entering the storm water conveyance.

c. Effluent Limitations and Monitoring, Outfall 001 – Conventional and Non-Conventional Pollutants

No changes to the pH limitations requirements are proposed.

pH limitations are set at the water quality criteria.

d. Effluent Limitations and Monitoring Summary

The effluent limitations are presented in the Section 19 of this Fact Sheet. Limitations and/or monitoring requirements were established for pH, vinyl chloride, cis-1,2 dichloroethylene, trans-1,2 dichloroethylene and trichloroethylene (TCE).

Vinyl chloride, cis-1,2 dichloroethylene and trans-1,2 dichloroethylene are required as they are degradation products of TCE.

Sample Types are in accordance with the recommendations in the VPDES Permit Manual.

The proposed Sample Frequencies of once per six months (1/6M) in lieu of the agency recommended once per quarter (1/3M) are based on best professional judgement, allowable frequency reduction as prescribed in the VPDES Permit Manual and the compliance history of the facility.

18. Antibacksliding:

All limits in this permit are at least as stringent as those previously established. Backsliding does not apply to this reissuance.

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19. Effluent Limitations/Monitoring Requirements for Outfall 001:

Maximum Flow of this dewatering system is variable.

Effective Dates: During the period beginning with the permit's effective date and lasting until the expiration date.

PARAMETER	BASIS FOR LIMITS	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		Monthly Average	Daily Maximum	Minimum	Maximum	Frequency	Sample Type
Flow (MGD)	NA	NL	NA	NA	NL	1/6M	Estimate
pH	3	NL	NL	6.0 S.U.	9.0 S.U.	1/6M	Grab
Vinyl Chloride	2,3	NA	NA	NA	24 µg/L*	1/6M	Grab
cis-1,2 Dichloroethylene	2,3	NA	NA	NA	NL µg/L	1/6M	Grab
trans-1,2 Dichloroethylene	2,3	NA	NA	NA	10,000 µg/L*	1/6M	Grab
Trichloroethylene (TCE)	2,3	NA	NA	NA	300 µg/L*	1/6M	Grab

The basis for the limitations codes are:

1. Federal Effluent Requirements
2. Best Professional Judgement
3. Water Quality Standards

MGD = Million gallons per day.

1/6M = Once every six months.**

NA = Not applicable.

NL = No limit; monitor and report.

S.U. = Standard units.

Estimate = Reported flow is to be based on the technical evaluation of the sources contributing to the discharge.

Grab = An individual sample collected over a period of time not to exceed 15-minutes.

*Should effluent results exceed the stated limitation, the permittee shall resample for that specific parameter within 30 days of receipt of laboratory results.

Should the second laboratory results exceed the limitations as set forth, the permittee shall submit to DEQ-NRO for approval a corrective action plan within 30 days of receipt of results. If the resulting exceedances have a reasonable potential to cause or contribute to human health and/or receiving stream impacts, the permittee may be required to reinstall, if applicable, and reactivate the treatment system upon DEQ written notification. In addition, the sampling frequency may also be increased to once per quarter (1/3M).

**The semiannual monitoring periods shall be January through June and July through December.

The DMR shall be submitted no later than the 10th day of the month following the monitoring period.

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20. Other Permit Requirements:

Permit Section Part I.B. contains quantification levels and compliance reporting instructions

9VAC25-31-190.L.4.c. requires an arithmetic mean for measurement averaging and 9VAC25-31-220.D. requires limits be imposed where a discharge has a reasonable potential to cause or contribute to an instream excursion of water quality criteria. Specific analytical methodologies for toxics are listed in this permit section as well as quantification levels (QLs) necessary to demonstrate compliance with applicable permit limitations or for use in future evaluations to determine if the pollutant has reasonable potential to cause or contribute to a violation. Required averaging methodologies are also specified.

21. Other Special Conditions:

- a. O&M Manual Requirement. Required by Code of Virginia §62.1-44.19; VPDES Permit Regulation, 9VAC25-31-190.E and 40 CFR 122.41(e). The permittee shall maintain a current Operations and Maintenance (O&M) Manual. The permittee shall operate the treatment works, when installed and operating, in accordance with the O&M Manual and shall make the O&M Manual available to Department personnel for review upon request. Any changes in the practices and procedures followed by the permittee shall be documented in the O&M Manual within 90 days of the effective date of the changes. Non-compliance with the O&M Manual shall be deemed a violation of the permit.
- b. Notification Levels. Required by VPDES Permit Regulation, 9VAC25-31-200.A. for existing manufacturing, commercial, mining and silvicultural dischargers. The permittee shall report discharges of toxic pollutants not limited by this permit that exceed notification levels.
- c. Materials Handling/Storage. 9VAC25-31-50.A. prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia §62.1-44.16 and §62.1-44.17 authorize the Board to regulate the discharge of industrial waste or other waste.
- d. Water Quality Criteria Reopener. The VPDES Permit Regulation at 9VAC25-31-220.D. requires establishment of effluent limitations to ensure attainment/maintenance of receiving stream water quality criteria. Should effluent monitoring indicate the need for any water quality-based limitations, this permit may be modified or alternatively revoked and reissued to incorporate appropriate limitations.
- e. Outfall Relocation. The permittee or his designee, within 30 days of the effective date of this permit, will be required to submit for DEQ-NRO staff approval the location at which monitoring for the parameters found in Section 19 will occur during this permit term.
- f. Treatment System Notification. The permittee or his designee will have a 30 day notification requirement prior to taking the treatment system offline. If the treatment unit is to be removed from the site, the permittee or his designee will also have a 30 day notification requirement prior to removal.
- g. Additional Reporting Requirement. The permittee or his designee will be required to supply a copy of all reporting documentation as required by this permit to Fairfax County.
- h. Total Maximum Daily Load (TMDL) Reopener. Section 303(d) of the Clean Water Act requires that Total Maximum Daily Loads (TMDLs) be developed for streams listed as impaired. This special condition is to allow the permit to be reopened if necessary to bring it into compliance with any applicable TMDL approved for the receiving stream. The reopener recognizes that, according to Section 402(o)(1) of the Clean Water Act, limits and/or conditions may be either more or less stringent than those contained in this permit. Specifically, they can be relaxed if they are the result of a TMDL, basin plan or other wasteload allocation prepared under section 303 of the Act.

22. Permit Section Part II:

Required by VPDES Regulation 9VAC25-31-190, Part II of the permit contains standard conditions that appear in all VPDES Permits. In general, these standard conditions address the responsibilities of the permittee, reporting requirements, testing procedures and records retention.

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23. Changes to the Permit from the Previously Issued Permit:

a. Special Conditions:

- The Effluent Monitoring Frequency special condition was removed with this reissuance.
- Outfall Relocation, Treatment System Status Notification and Additional Reporting Requirement were included with this reissuance.

b. Monitoring and Effluent Limitations:

- There were no changes to the monitoring or effluent limitations during this reissuance. However, should laboratory results indicate limitation exceedances, the permittee will be required to resample the effluent within 30 days. If the second sampling results confirm the original, the permittee may be required to reactivate the treatment system and the sampling frequencies may also increase to once per quarter (1/3M) upon DEQ written notification.

c. Other:

- The receiving stream, river mile and drainage area were updated during this permit action per the planning statement.

24. Variances/Alternate Limits or Conditions:

The permittee will be allowed to move the outfall downstream from the current location during this permit term. Data suggests that attenuation (volatilization) occurs during dewatering prior to entering the storm water conveyance; possibly allowing for the air stripper to be taken offline and reducing the carbon foot print from this operation.

25. Public Notice Information:

First Public Notice Date: 18 September 2015

Second Public Notice Date: 25 September 2015

Public Notice Information is required by 9VAC25-31-280.B. All pertinent information is on file and may be inspected and copied by contacting the: DEQ Northern Regional Office; 13901 Crown Court; Woodbridge, VA 22193; Telephone No. 703-583-3873, Douglas.Frasier@deq.virginia.gov. See **Attachment 14** for a copy of the public notice document.

Persons may comment in writing or by email to the DEQ on the proposed permit action and may request a public hearing, during the comment period. Comments shall include the name, address and telephone number of the writer and of all persons represented by the commenter/requester, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit. Requests for public hearings shall state 1) the reason why a hearing is requested; 2) a brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit; and 3) specific references, where possible, to terms and conditions of the permit with suggested revisions. Following the comment period, the Board will make a determination regarding the proposed permit action. This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given. The public may request an electronic copy of the draft permit and fact sheet or review the draft permit and application at the DEQ Northern Regional Office by appointment.

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26. Additional Comments:

Previous Board Action(s):	None since the last Special Order by Consent in 2005 for administrative items.
Staff Comments:	This reissuance was delayed due to the late submittal of the application package, discussions with Fairfax County MS4 staff concerning this discharge and agency processing delays.
State/Federal Agency Comments:	No comments were received.
Public Comments:	No comments were received during the public notice.
Owner Comments:	Minor edits were requested from the permittee and were agreed upon by staff.

Fact Sheet Attachments

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VA00090093
2015 Reissuance

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Attachment 2	Foundation Drain Plumbing and Layout
Attachment 3	June 2007 – May 2009 Influent Data
Attachment 4	July 2009 Attenuation Exercise
Attachment 5	Onsite Stormwater BMP Photos
Attachment 6	Stormwater BMP and Stormwater Conveyance Distances
Attachment 7	NPDES Permit Rating Worksheet
Attachment 8	Facility Schematic/Diagram
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Attachment 11	Planning Statement
Attachment 12	Water Quality Criteria / Wasteload Allocation Analysis
Attachment 13	June 2010 – March 2014 Effluent Data
Attachment 14	Public Notice

ATTACHMENT 1

Flow Frequency Determination

RECEIVED

OCT 30 1998

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY - WATER DIVISION
Water Quality Assessments and Planning
629 E. Main Street P.O. Box 10009 Richmond, Virginia 23240
Norfolk, VA 23500
Dept. of Env. Quality

SUBJECT: Flow Frequency Determination
John Marshall III Site - #VA0090093

TO: Shih-Cheng Chang, NRO

FROM: Paul E. Herman, P.E., WQAP. *Paul*

DATE: October 28, 1998

COPIES: Ron Gregory, Charles Martin, File

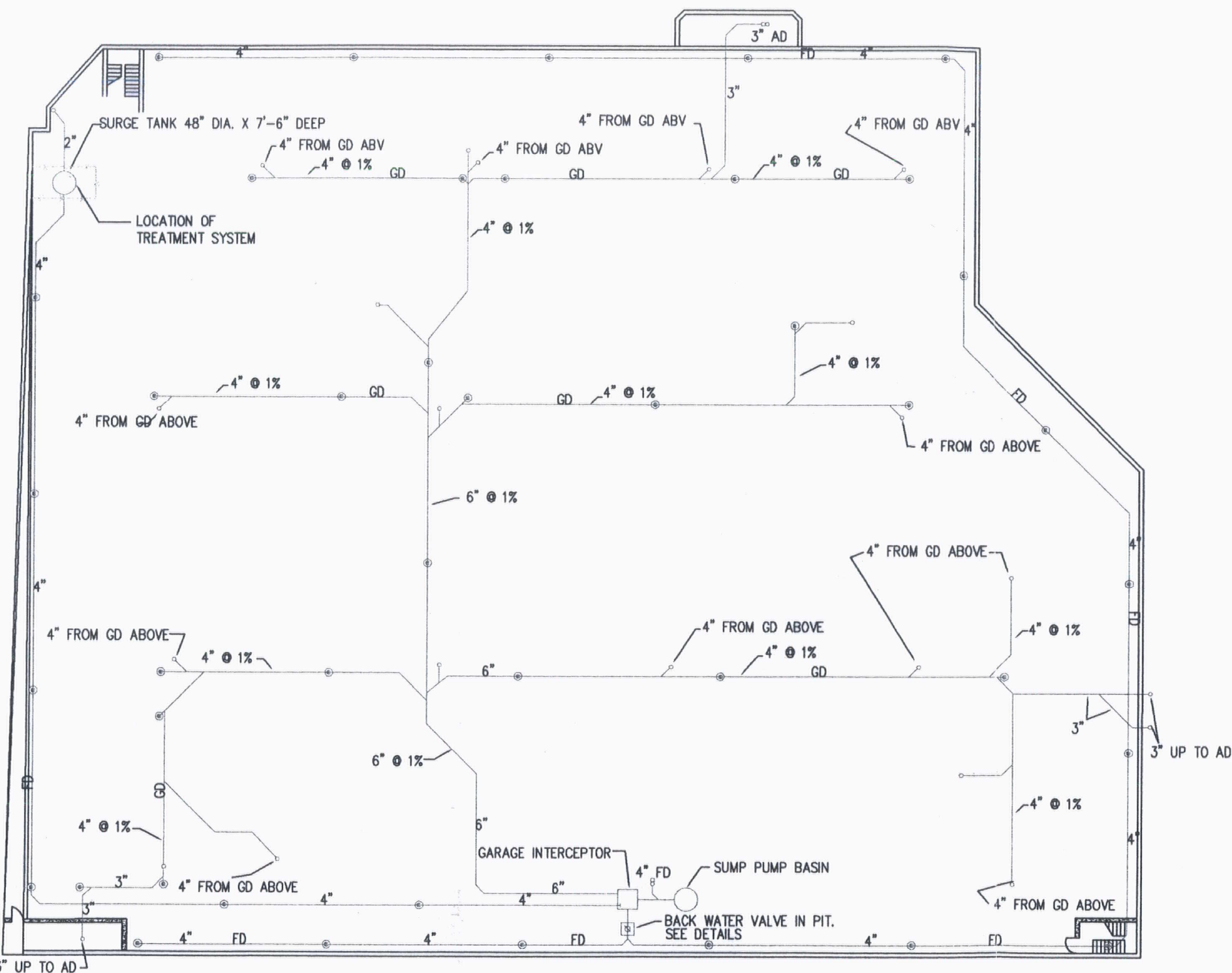
The John Marshall III Site discharges to a storm sewer which drains to the Old Courthouse Spring Branch near Tysons Corner, VA. Flow frequencies are required at this site for use by the permit writer in developing effluent limitations for the VPDES permit.

The values at the discharge point were determined by inspection of the USGS Falls Church Quadrangle topographical map which shows the receiving stream as intermittent at the sewer line discharge point. The flow frequencies for intermittent streams are 0.0 cfs for the 1Q10, 7Q10, 30Q5, high flow 1Q10, high flow 7Q10, and the harmonic mean. The drainage area above the discharge point is 0.33 mi².

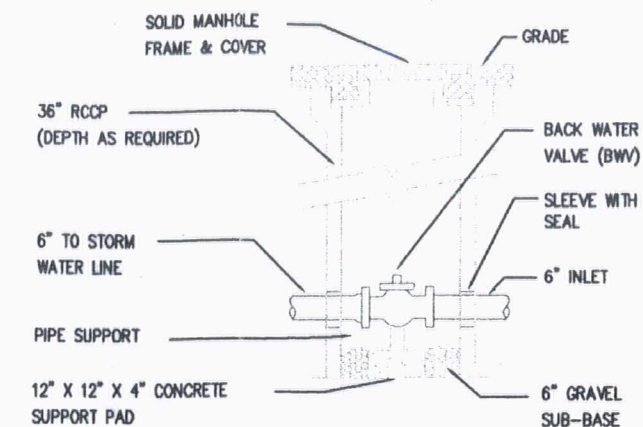
If you have any questions concerning this analysis, please let me know.

ATTACHMENT 2

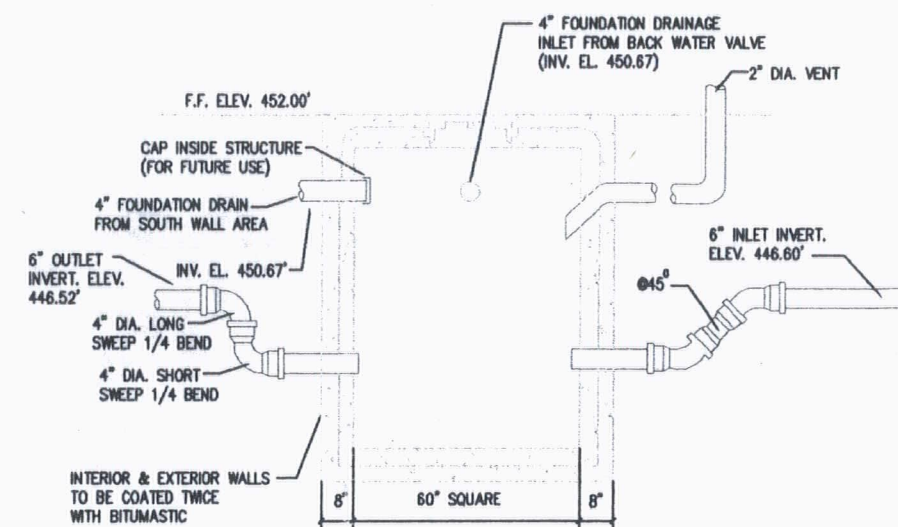
Foundation Drain Plumbing and Layout



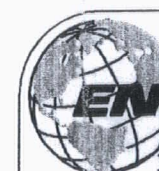
PLUMBING - FOUNDATION PLAN
SCALE: 1/32"=1'-0"



BACKWATER VALVE IN PIT DETAIL
NO SCALE



GARAGE INTERCEPTOR DETAIL
NO SCALE



ENVIRONMENTAL SERVICE AND TECHNOLOGY CORPORATION
15510 MONTANUS DRIVE, SUITE B • CULPEPER, VIRGINIA 22701
PHONE: (540) 825-9083 • FAX: (540) 825-9087
E-MAIL: www.ensatcorp.com

LEGEND

- CLEAN OUT STRUCTURE
- PIPING
- FENCED ENCLOSURE

SITE:

JOHN MARSHALL III OFFICE BUILDING
MCLEAN, VIRGINIA

JOB# 97A-1241	DATE: 08/21/00	SCALE: AS NOTED
DWN: VTD	FILE: 97A1241P.DWG	PROJECT MANAGER: AML

Figure 1: Foundation Drain Plumbing and Layout

ATTACHMENT 3

June 2007 – May 2009 Influent Data

John Marshall III Site
8251 Greensboro Drive, B100
McLean, VA 22102
Permit Number: VA0090093

TABLE 1. SUMMARY OF AIR STRIPPER WATER QUALITY DATA

Target Analyte VDEQ SWQS Sample Collection Date	Vinyl Chloride 61		Methylene Chloride 1,600		Chloroform 29,000		Trichloroethylene 810		Tetrachloroethylene 89	
	Influent	Effluent	Influent	Effluent	Influent	Effluent	Influent	Effluent	Influent	Effluent
6/21/2007	4.2 J	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	300	3.2 J	5.0 U	5.0 U
7/24/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	100	5.0 U	5.0 U	5.0 U
8/20/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	86	5.0 U	5.0 U	5.0 U
9/18/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	51	9.7	5.0 U	5.0 U
10/16/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	28	6.7	5.0 U	5.0 U
11/9/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	87	5.0 U	5.0 U	5.0 U
12/13/2007	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	25	5.0 U	5.0 U	5.0 U
1/11/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	76	5.0 U	5.0 U	5.0 U
2/14/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	316	2.6 J	5.0 U	5.0 U
3/13/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	432	254	5.0 U	5.0 U
4/14/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	192	5.0 U	5.0 U	5.0 U
5/16/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	1190	5.0 U	5.0 U	5.0 U
6/20/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	489	5.0 U	5.0 U	5.0 U
7/15/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	280	5.0 U	5.0 U	5.0 U
8/19/2008	2.7 J	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	106	5.0 U	5.0 U	5.0 U
9/15/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	142	5.0 U	5.0 U	5.0 U
10/23/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	233	5.0 U	5.0 U	5.0 U
11/17/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	157	5.0 U	5.0 U	5.0 U
12/15/2008	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	118	5.0 U	5.0 U	5.0 U
1/22/2009	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	159	2.1 J	5.0 U	5.0 U
2/11/2009	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	152	5.0 U	5.0 U	5.0 U
3/17/2009	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	45	5.0 U	5.0 U	5.0 U
4/16/2009	4.0 U	2.0 U	4.0 U	2.0 U	4.0 U	2.0 U	304	2.1	4.0 U	2.0 U
5/13/2009	5.0 U	2.0 U	2.1 J	2.0 U	5.0 U	2.0 U	788	6.6	5.0 U	2.0 U
5/26/2009	2.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	491	2.8 J	5.0 U	5.0 U

AVERAGE 3.45 J 4.8 U 2.1 U 4.8 U 5.0 U 4.8 U 254 15 5.0 U 4.8 U

Units = µg/L

VADEQ SWQS = Virginia Department of Environmental Quality Surface Water Quality Standard.

U = the analyte was analyzed for, but was not detected above the reported sample quantitation limit.

J = the analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.

ATTACHMENT 4

July 2009 Attenuation Exercise



ECS MID-ATLANTIC, LLC

"Setting the Standard for Service"

Geotechnical • Construction Materials • Environmental • Facilities

September 30, 2009

Mr. Douglas Frasier
Environmental Specialist II Senior
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, Virginia 22193

ECS Project No. 3106-M
VPDES Permit Number: VA0090093

Reference: VPDES Permit Renewal, John Marshall III Site, 8283-C Greensboro Drive,
McLean, Virginia.

Dear Mr. Frasier:

This letter is in regards to proposed changes to the Virginia Pollutant Discharge Elimination System (VPDES) permit (VA0090093) for the John Marshall III site owned by Marshall Property, LLC. As you are aware, the site has a 5-level below grade parking garage and groundwater that would otherwise be discharged to the garage is collected, treated and discharged under the VPDES permit. The permit is currently up for renewal.

In accordance with our letter dated June 12, 2009 and as we discussed by phone in July, we have collected data to support proposed effluent limitations and discontinuation of the existing air stripper treatment system for the discharge. More specifically, we have agreed that the effluent limitations for discharge from the parking garage would be made equivalent to VDEQ Surface Water Quality Standards (SWQS) if it was demonstrated that sufficient volatilization occurs within the discharge pipe to maintain discharge concentrations below SWQS standards without air stripper treatment.

The following sampling procedure was discussed with you and then implemented to measure the concentrations of compounds of concern in water being discharged from the garage without air stripper treatment:

1. ECS personnel temporarily shut down the air stripper on July 22, 2009 to ensure that the outfall line was flushed of any "treated" water prior to sample collection.
2. On July 24, 2009 samples were collected from the air stripper influent and effluent sampling points and at a surface location immediately outside the parking garage (approximately 50 ft down gradient of the air stripper effluent sampling point).
3. Post sample collection the air stripper was reactivated.

Analytical results are summarized in Table 1.

Table 1. Summary of Analytical Results from Samples Collected July 24, 2009.

Parameter	VDEQ SWQS (µg/L)	Influent (µg/L)	Effluent (µg/L)	Surface (µg/L)	% Volatilization*
Chloroform	29,000	2.0 U	2.0 U	2.0 U	NA
Methylene Chloride	1,600	2.0 U	2.0 U	2.0 U	NA
Tetrachloroethylene	89	2.0 U	2.0 U	2.0 U	NA
Trichloroethylene	810	152	144	51	66.4 %
Vinyl Chloride	61	2.0 U	2.0 U	2.0 U	NA

U = analyte was analyzed for but not detected above the analytical reporting limit.

* = percent removal calculated based on Influent sample result.

As shown in Table 1, all chemical constituent concentrations in all influent, effluent and outfall samples were well below the respective VDEQ SWQS.

It is noted that all influent, effluent and outfall concentrations were all non-detect except for the concentrations of trichloroethylene (TCE). TCE was detected in the influent, effluent and discharge samples but at levels well below the VDEQ SWQS. As you are aware, the source of the TCE is an off-site historic source. Furthermore, there was a 66.4% reduction in the trichloroethylene (TCE) concentration from the influent sampling point to the surface discharge point without air stripper treatment. Based on this reduction, in order to maintain the final surface discharge TCE concentration below the SWQS of 810 ug/L without treatment, it is estimated that the influent TCE concentration would need to remain below 2,380 ug/L (810 ug/L is 64% of 2,380 ug/L). Since the inception of influent monitoring 21 June 2007, the influent TCE concentration has averaged ~300 ug/L, with two high rain events resulting in slightly elevated concentrations (1190 ug/L observed on May 16, 2008 and 1200 ug/L observed on June 15, 2009). Thus, based on the historical data, it is highly unlikely that the surface water discharge would contain TCE at concentrations that approach the SWQS in the future even without air stripper treatment.

The operating, maintenance and reporting costs to the property owner to treat the groundwater migrating from the off-site historic source with the air stripper are greater than \$30,000 per year. As evidenced by the data summarized above, which indicate that air stripper treatment is not necessary to achieve a TCE concentration below the SWQS, the benefits of continued air stripper operation do not outweigh the associated operational costs.

Based on the summarized analytical results, the absence of treatment benefits when weighed against the costs, and in accordance with our previous correspondence, we are requesting that the site's new permit be modified as follows:

- Approval to permanently shutdown and dismantle the air stripper.

- Establishment of discharge criteria equivalent to the VDEQ Surface Water Quality Standards (SWQS).
- Reduction of monitoring frequency from monthly to quarterly, for one year; after which semi-annual monitoring may be requested by the property owner if the monitoring results remain less than VDEQ SWQS.

If there are any other questions or comments regarding this report please feel free to contact us.

Respectfully submitted,

ECS MID-ATLANTIC, LLC



David J. Bookbinder
Environmental Scientist



James D. Suecoff, C.P.G.
Director of Environmental Services

cc: Karen Gentry – Marshall Property, LLC c/o Beacon Capital Partners
Tim Incheck – Cassidy and Pinkard Colliers
Lisa S. Turturro – Haley & Aldrich, Inc.

I:\Environmental\RPT\3000\3106-M-VDEQ Update Letter.doc

ATTACHMENT 5

Onsite Stormwater BMP Photos



© 2015 Google

Google earth

Google earth

feet
meters







07/02/2015 01:45 PM



07/02/2015 01:45 PM

ATTACHMENT 6

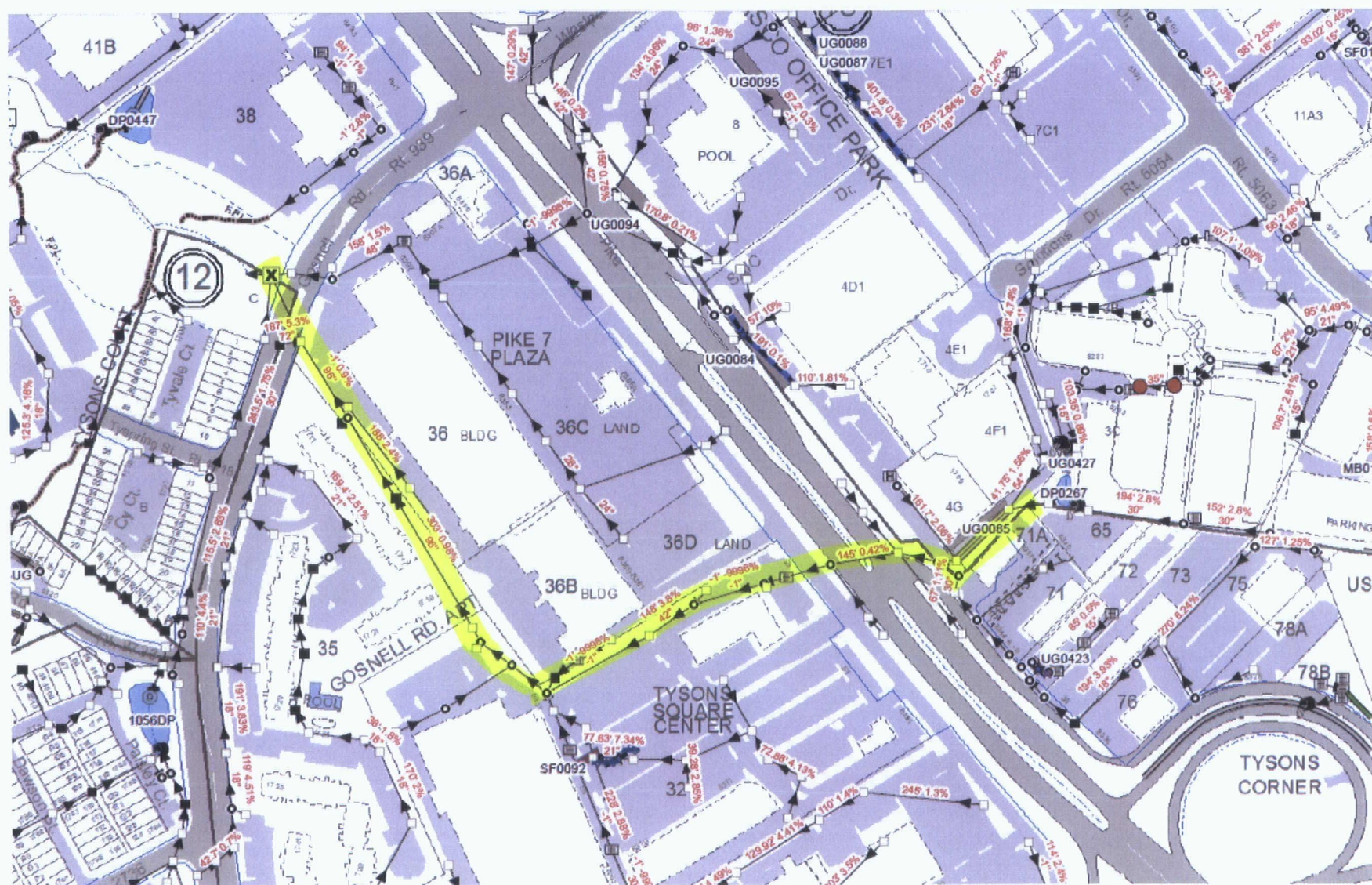
Stormwater BMP and Stormwater Conveyance Distances



Google earth

feet 100
meters 40





ATTACHMENT 7

NPDES Permit Rating Worksheet

NPDES PERMIT RATING WORK SHEET

VPDES NO. : VA0090093

- ☒ Regular Addition
☐ Discretionary Addition
☐ Score change, but no status Change
☐ Deletion

Facility Name: John Marshall III Site

City / County: McLean / Fairfax County

Receiving Water: Old Courthouse Spring Branch, UT

Waterbody ID: VAN-A11R

Is this facility a steam electric power plant (sic =4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)

2. A nuclear power Plant

3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rate

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

☐ YES; score is 700 (stop here)☒ NO; (continue)☐ Yes; score is 600 (stop here) ☒ NO; (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: _____ Primary Sic Code: 6512 Other Sic Codes: _____

Industrial Subcategory Code: 000 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input checked="" type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	15	<input type="checkbox"/> 7.	7	35
<input type="checkbox"/> 1.	1	5	<input type="checkbox"/> 4.	4	20	<input type="checkbox"/> 8.	8	40
<input type="checkbox"/> 2.	2	10	<input type="checkbox"/> 5.	5	25	<input type="checkbox"/> 9.	9	45
			<input type="checkbox"/> 6.	6	30	<input type="checkbox"/> 10.	10	50

Code Number Checked: 0

Total Points Factor 1: 0

FACTOR 2: Flow/Stream Flow Volume (Complete either Section A or Section B; check only one)

Section A – Wastewater Flow Only considered

Wastewater Type (see Instructions)	Code	Points
Type I: Flow < 5 MGD	<input type="checkbox"/> 11	0
Flow 5 to 10 MGD	<input type="checkbox"/> 12	10
Flow > 10 to 50 MGD	<input type="checkbox"/> 13	20
Flow > 50 MGD	<input type="checkbox"/> 14	30
Type II: Flow < 1 MGD	<input type="checkbox"/> 21	10
Flow 1 to 5 MGD	<input type="checkbox"/> 22	20
Flow > 5 to 10 MGD	<input type="checkbox"/> 23	30
Flow > 10 MGD	<input type="checkbox"/> 24	50
Type III: Flow < 1 MGD	<input type="checkbox"/> 31	0
Flow 1 to 5 MGD	<input type="checkbox"/> 32	10
Flow > 5 to 10 MGD	<input type="checkbox"/> 33	20
Flow > 10 MGD	<input type="checkbox"/> 34	30

Section B – Wastewater and Stream Flow Considered

Wastewater Type (see Instructions)	Percent of Instream Wastewater Concentration at Receiving Stream Low Flow	Code	Points
Type I/III:	< 10 %	<input type="checkbox"/> 41	0
	10 % to < 50 %	<input type="checkbox"/> 42	10
	> 50 %	<input checked="" type="checkbox"/> 43	20
Type II:	< 10 %	<input type="checkbox"/> 51	0
	10 % to < 50 %	<input type="checkbox"/> 52	20
	> 50 %	<input type="checkbox"/> 53	30

Code Checked from Section A or B: 43

Total Points Factor 2: 20

NPDES PERMIT RATING WORK SHEET

FACTOR 3: Conventional Pollutants

(only when limited by the permit)

A. Oxygen Demanding Pollutants: (check one) ☐ BOD ☐ COD ☒ Other: VOCs

Permit Limits: (check one)

<input checked="" type="checkbox"/>	< 100 lbs/day	1	0
<input type="checkbox"/>	100 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 3000 lbs/day	3	15
<input type="checkbox"/>	> 3000 lbs/day	4	20

Code Number Checked: 1Points Scored: 0

B. Total Suspended Solids (TSS)

Permit Limits: (check one)

<input type="checkbox"/>	< 100 lbs/day	1	0
<input type="checkbox"/>	100 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 5000 lbs/day	3	15
<input type="checkbox"/>	> 5000 lbs/day	4	20

Code Number Checked: NAPoints Scored: 0C. Nitrogen Pollutants: (check one) ☐ Ammonia ☐ Other: _____

Permit Limits: (check one)

	Nitrogen Equivalent	Code	Points
<input type="checkbox"/>	< 300 lbs/day	1	0
<input type="checkbox"/>	300 to 1000 lbs/day	2	5
<input type="checkbox"/>	> 1000 to 3000 lbs/day	3	15
<input type="checkbox"/>	> 3000 lbs/day	4	20

Code Number Checked: NAPoints Scored: 0Total Points Factor 3: 0**FACTOR 4: Public Health Impact**

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this include any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above reference supply.

☒ YES; (If yes, check toxicity potential number below)☐ NO; (If no, go to Factor 5)

Determine the *Human Health* potential from Appendix A. Use the same SIC doe and subcategory reference as in Factor 1. (Be sure to use the *Human Health* toxicity group column – check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
<input checked="" type="checkbox"/> No process waste streams	0	0	<input type="checkbox"/> 3.	3	0	<input type="checkbox"/> 7.	7	15
<input type="checkbox"/> 1.	1	0	<input type="checkbox"/> 4.	4	0	<input type="checkbox"/> 8.	8	20
<input type="checkbox"/> 2.	2	0	<input type="checkbox"/> 5.	5	5	<input type="checkbox"/> 9.	9	25
			<input type="checkbox"/> 6.	6	10	<input type="checkbox"/> 10.	10	30

Code Number Checked: 0Total Points Factor 4: 0

NPDES PERMIT RATING WORK SHEET

FACTOR 5: Water Quality Factors

- A. *Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-base federal effluent guidelines, or technology-base state effluent guidelines), or has a wasteload allocation been assigned to the discharge?*

	Code	Points
<input type="checkbox"/> YES	1	10
<input checked="" type="checkbox"/> NO	2	0

- B. *Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?*

	Code	Points
<input checked="" type="checkbox"/> YES	1	0
<input type="checkbox"/> NO	2	5

- C. *Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?*

	Code	Points
<input type="checkbox"/> YES	1	10
<input checked="" type="checkbox"/> NO	2	0

Code Number Checked: A 2 + B 1 + C 2
Points Factor 5: A 0 + B 0 + C 0 = 0

FACTOR 6: Proximity to Near Coastal Waters

- A. Base Score: Enter flow code here (from factor 2) 43

Check appropriate facility HPRI code (from PCS):

HPRI#	Code	HPRI Score
<input type="checkbox"/> 1	1	20
<input type="checkbox"/> 2	2	0
<input checked="" type="checkbox"/> 3	3	30
<input type="checkbox"/> 4	4	0
<input type="checkbox"/> 5	5	20

HPRI code checked: 3

Base Score (HPRI Score): 30 X (Multiplication Factor) 0.10 = 3

Enter the multiplication factor that corresponds to the flow code: 0.10

Flow Code	Multiplication Factor
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

Code	Points
<input checked="" type="checkbox"/> 1	10
<input type="checkbox"/> 2	0

Code Number Checked: A 3 + B 1 + C 2
Points Factor 6: A 3 + B 10 + C 0 = 13

C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 area's of concern (see instructions)?

Code	Points
<input type="checkbox"/> 1	10
<input checked="" type="checkbox"/> 2	0

NPDES PERMIT RATING WORK SHEET

SCORE SUMMARY

<u>Factor</u>	<u>Description</u>	<u>Total Points</u>
1	Toxic Pollutant Potential	0
2	Flows / Streamflow Volume	20
3	Conventional Pollutants	0
4	Public Health Impacts	0
5	Water Quality Factors	0
6	Proximity to Near Coastal Waters	13
TOTAL (Factors 1 through 6)		33

S1. Is the total score equal to or greater than 80 ☐ YES; (Facility is a Major) ☒ NO

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

☒ NO

☐ YES; (Add 500 points to the above score and provide reason below:

Reason: _____

NEW SCORE : 33
OLD SCORE : 33

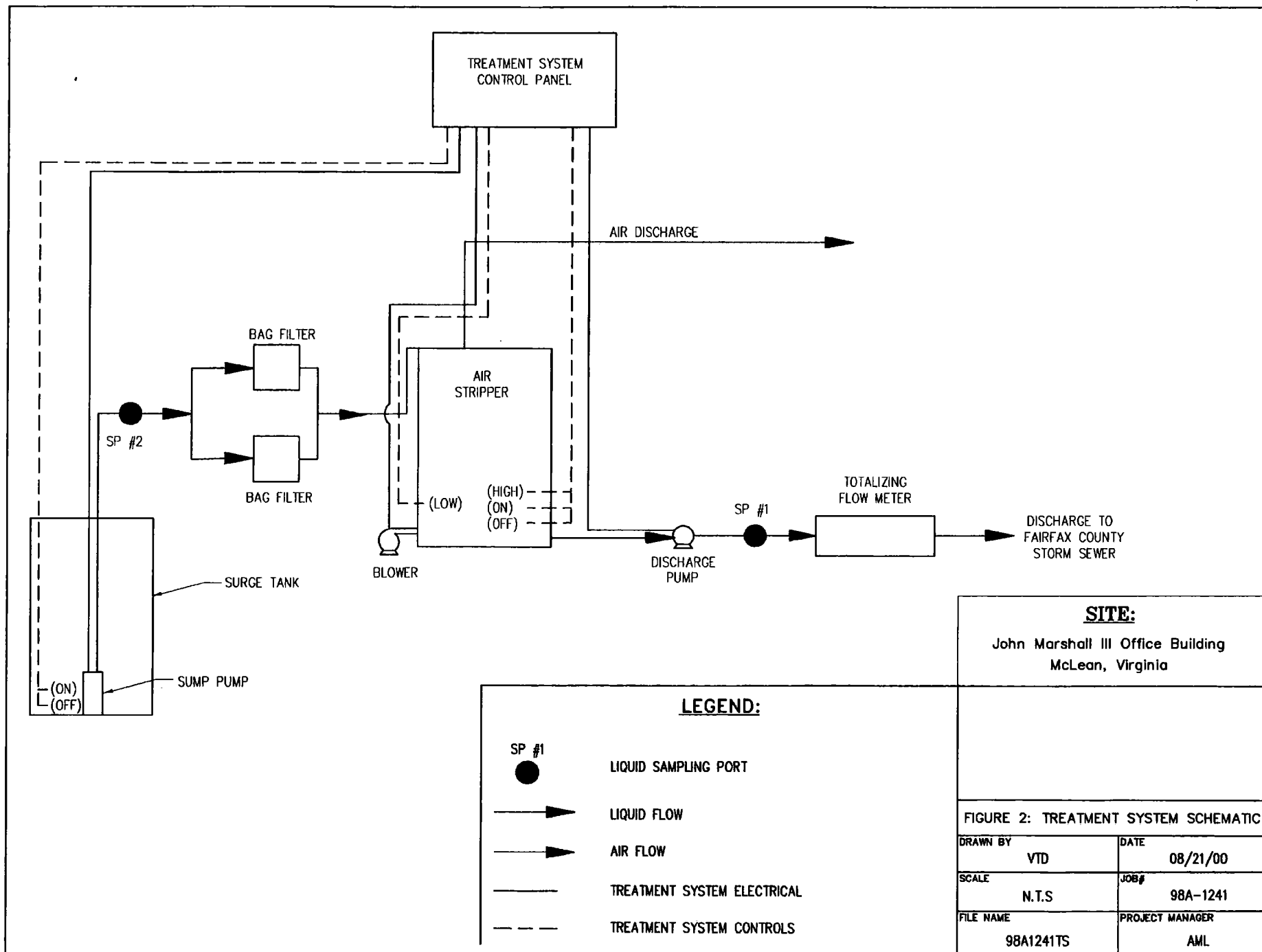
Permit Reviewer's Name : Douglas Frasier

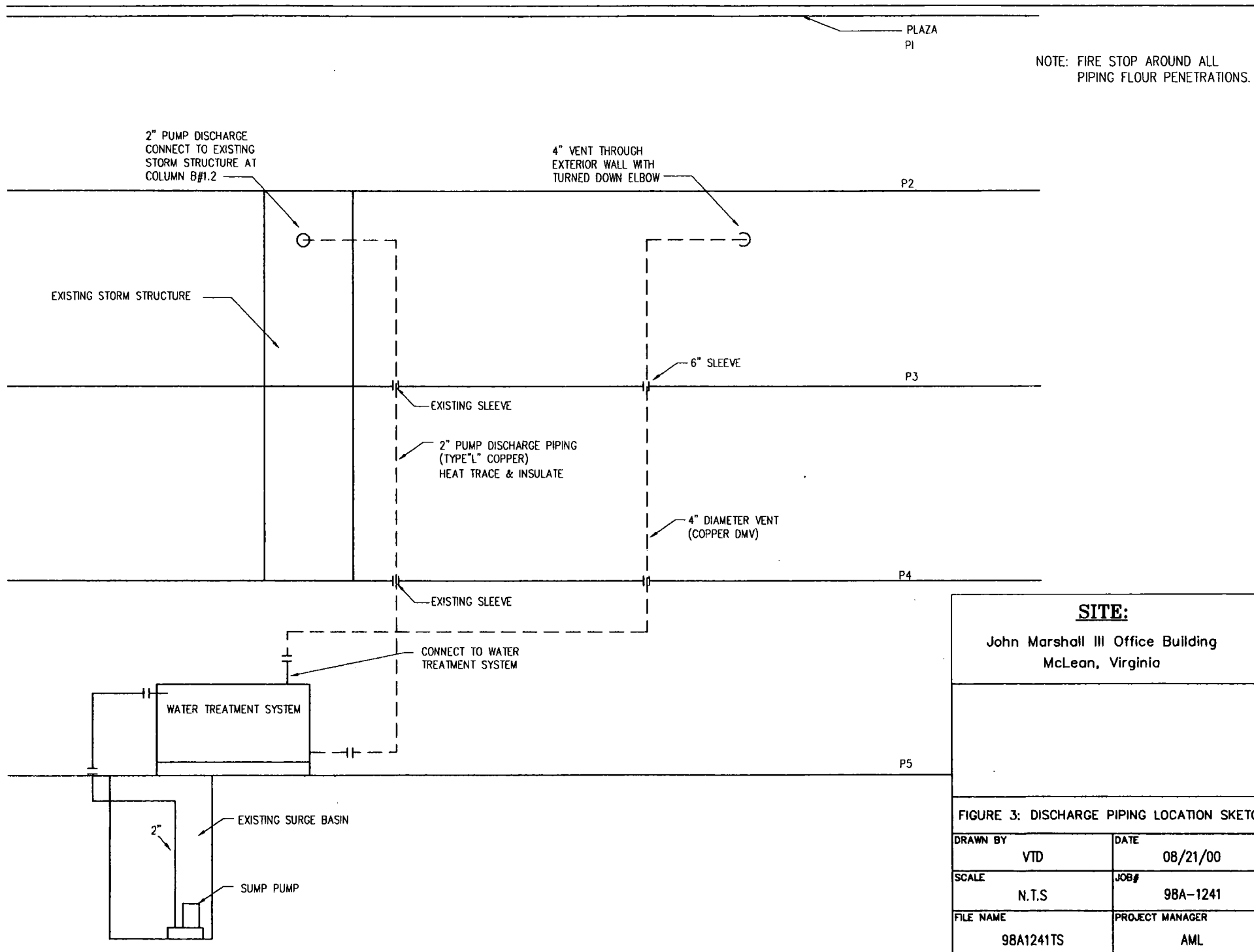
Phone Number: 703-583-3873

Date: 15 July 2015

ATTACHMENT 8

Facility Schematic/Diagram





SITE:

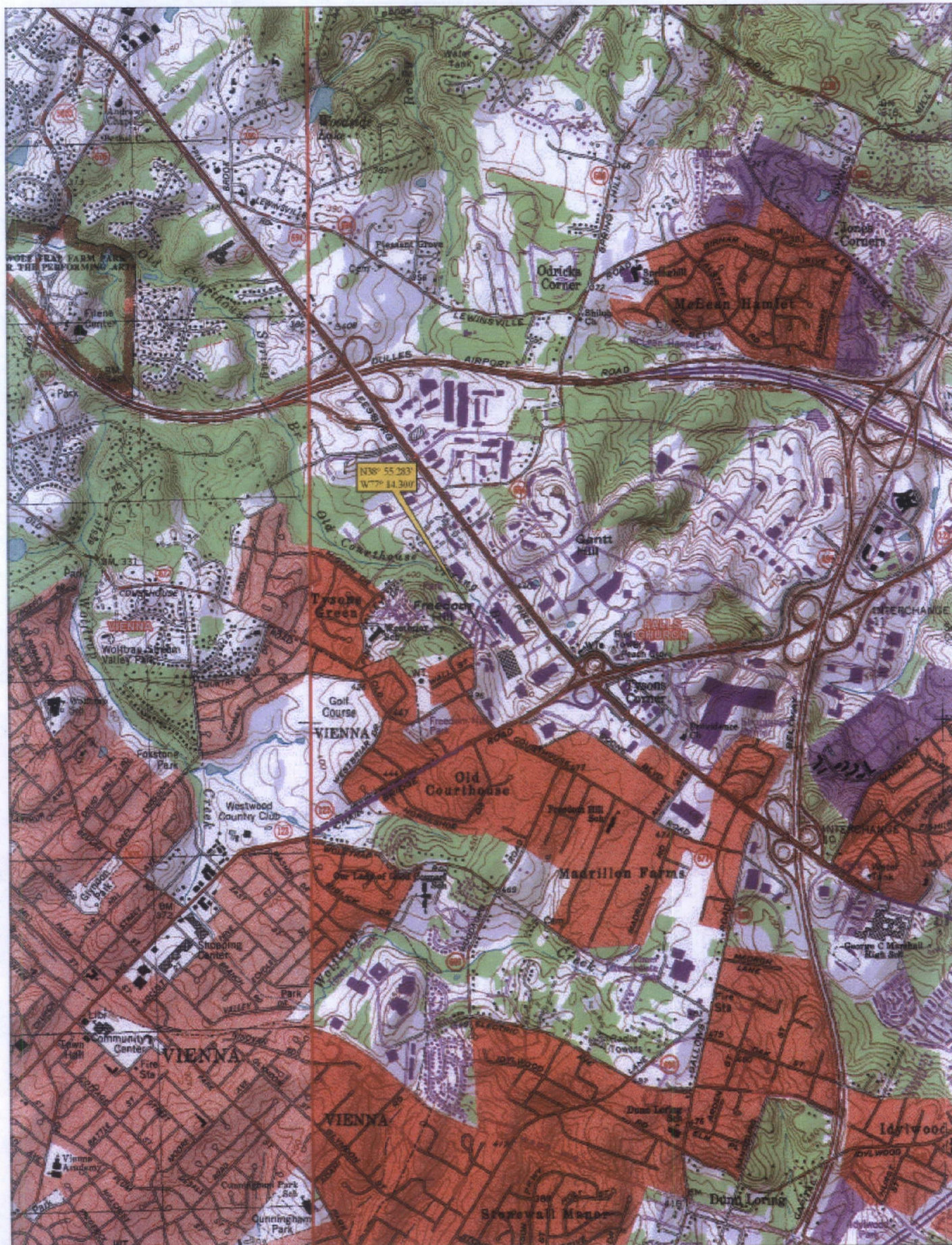
John Marshall III Office Building
McLean, Virginia

FIGURE 3: DISCHARGE PIPING LOCATION SKETCH

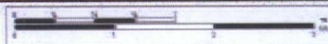
DRAWN BY	VTD	DATE	08/21/00
SCALE	N.T.S	JOB#	98A-1241
FILE NAME	98A1241TS	PROJECT MANAGER	AML

ATTACHMENT 9

Topographic Map



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www.delorme.com



ATTACHMENT 10

Site Inspection Report



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

(703) 583-3800 Fax (703) 583-3821

www.deq.virginia.gov

Preston Bryant
Secretary of Natural Resources

David K. Paylor
Director

Thomas Faha
Regional Director

October 29, 2008

Mr. Tim Incheck
Cassidy & Pinkard
8251 Greensboro Drive
Suite B100
McLean, VA 22102

Re: John Marshall III Site Technical Inspection – VA0090093

Dear Mr. Incheck:

Attached is a copy of the technical inspection report generated while conducting a Facility Technical Inspection at the John Marshall III site groundwater remediation system on October 23, 2008. The compliance staff would like to thank Mr. David Bookbinder for his time and assistance during the inspection.

Review of the Discharge Monitoring Reports shows minor problems with the sample analysis. These have been discussed with Mr. Bookbinder. No response is required to this report since future DMR submittals will address the sample analysis problems.

If you have any questions or comments concerning this report, please feel free to contact me at the Northern Regional Office at (703) 583-3833 or by E-mail at twnelson@deq.virginia.gov.

Sincerely,

Terry Nelson
Environmental Specialist II

cc: Permit/DMR File
Compliance Manager
Compliance Auditor
Compliance Inspector
Mr. David Bookbinder – ECS
Steve Stell – OWCP – EPA COPY

DEQ
WASTEWATER FACILITY INSPECTION REPORT
PREFACE

VPDES/State Certification No.	(RE) Issuance Date	Amendment Date	Expiration Date				
VA0090093	July 8, 2004		July 7, 2009				
Facility Name	Address		Telephone Number				
John Marshall III	8283-C Greensboro Drive McLean, VA		NA				
Owner Name	Address		Telephone Number				
Beacon Capital Partners, LLC	200 State St., 5th Fl. Boston, MA 02109		NA				
Responsible Official	Address		Telephone Number				
Mr. Tim Incheck Senior Operations Manager	Cassidy & Pinkard Colliers 8251 Greensboro Drive, Suite B100 McLean, VA 22102		703-902-6666				
Responsible Operator	Operator Cert. Class/number		Telephone Number				
David Bookbinder	NA		703-995-6540				
TYPE OF FACILITY:							
DOMESTIC		INDUSTRIAL					
Federal		Major					
Non-federal		Minor	X				
INFLUENT CHARACTERISTICS:		DESIGN:					
	Flow	Variable					
	Population Served	NA					
	Connections Served	NA					
	BOD ₅	NA					
	TSS	NA					
EFFLUENT LIMITS.							
Parameter	Min.	Avg.	Max.	Parameter	Min.	Avg.	Max.
Flow (MGD)		NL	NL	TCE (ug/L)			NL
pH (S.U.)	6		9	Vinyl Chloride (ug/L)			NL
Methylene Chloride (ug/L)			NL	Chloroform (ug/L)			NL
Tetrachloroethylene (ug/L)			NL				
	Receiving Stream		Old Courthouse Spring Branch				
	Basin		Potomac River				
	Discharge Point (LAT)		38° 55' 17" N				
	Discharge Point (LONG)		77° 14' 18" W				

Virginia Department of Environmental Quality
Northern Regional Office

FOCUSED CEI TECH/LAB INSPECTION REPORT

FACILITY NAME: John Marshall III		INSPECTION DATE: October 23, 2008	
		INSPECTOR: Terry Nelson	
PERMIT No.: VA0090093		REPORT DATE: October 24, 2008	
TYPE OF FACILITY: <input type="checkbox"/> Municipal <input type="checkbox"/> Major <input checked="" type="checkbox"/> Industrial <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Federal <input type="checkbox"/> Small Minor <input type="checkbox"/> HP <input type="checkbox"/> LP		TIME OF INSPECTION:	Arrival 1000 Departure 1030 6 hours
PHOTOGRAPHS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		UNANNOUNCED INSPECTION? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
REVIEWED BY / Date:			
PRESENT DURING INSPECTION: Doug Frasier, VA DEQ Tim Incheck, Cassidy & Pinkard Colliers David Bookbinder, ECS			

TECHNICAL INSPECTION

1. Has there been any new construction? • If so, were plans and specifications approved? <u>Comments:</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Is the Operations and Maintenance Manual approved and up-to-date? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Are the Permit and/or Operation and Maintenance Manual specified licensed operator being met? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Are the Permit and/or Operation and Maintenance Manual specified operator staffing requirements being met? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Is there an established and adequate program for training personnel? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Are preventive maintenance task schedules being met? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Does the plant experience any organic or hydraulic overloading? <u>Comments:</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8. Have there been any bypassing or overflows since the last inspection? <u>Comments:</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9. Is the standby generator (including power transfer switch) operational and exercised regularly? <u>Comments:</u> Not applicable	<input type="checkbox"/> Yes <input type="checkbox"/> No
10. Is the plant alarm system operational and tested regularly? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

TECHNICAL INSPECTION

11. Is sludge disposed of in accordance with the approved sludge management plan? <u>Comments:</u> Not applicable	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. Is septage received? • If so, is septage loading controlled, and are appropriate records maintained? <u>Comments:</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
13. Are all plant records (operational logs, equipment maintenance, industrial waste contributors, sampling and testing) available for review and are records adequate? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14. Which of the following records does the plant maintain? <input checked="" type="checkbox"/> Operational logs <input checked="" type="checkbox"/> Instrument maintenance & calibration <input type="checkbox"/> Mechanical equipment maintenance <input type="checkbox"/> Industrial Waste Contribution (Municipal facilities) <u>Comments:</u>	
15. What does the operational log contain? <input checked="" type="checkbox"/> Visual observations <input checked="" type="checkbox"/> Flow Measurement <input type="checkbox"/> Laboratory results <input checked="" type="checkbox"/> Process adjustments <input type="checkbox"/> Control calculations <input type="checkbox"/> Other (specify) _____ <u>Comments:</u>	
16. What do the mechanical equipment records contain? <input type="checkbox"/> As built plans and specs <input type="checkbox"/> Manufacturers instructions <input type="checkbox"/> Lubrication schedules <input type="checkbox"/> Spare parts inventory <input type="checkbox"/> Equipment/parts suppliers <input type="checkbox"/> Other (specify) _____ <u>Comments:</u> The mechanical records and information is being handled by ENSAT who are based in Culpeper	
17. What do the industrial waste contribution records contain (Municipal only)? <input type="checkbox"/> Waste characteristics <input type="checkbox"/> Impact on plant <input type="checkbox"/> Locations and discharge types <input type="checkbox"/> Other (specify) _____ <u>Comments:</u>	
18. Which of the following records are kept at the plant and available to personnel? <input type="checkbox"/> Equipment maintenance records <input checked="" type="checkbox"/> Operational log <input type="checkbox"/> Industrial contributor records <input type="checkbox"/> Instrumentation records <input checked="" type="checkbox"/> Sampling and testing records <u>Comments:</u> Consultants maintain log book that they bring with them to the site.	
19. List records not normally available to plant personnel and their location: <u>Comments:</u>	
20. Are the records maintained for the required time period (three or five years)? <u>Comments:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

UNIT PROCESS EVALUATION SUMMARY SHEET

Background

VPDES Permit VA0090093 was re-issued to EOP Marshall LLC in 2004. In April 2007, Beacon Properties Corporation and Equity Office Properties merged to form Beacon Capital Partners. Cassidy & Pinkard Colliers are the current property managers. The permit authorizes the discharge of contaminated foundation drainage to the Fairfax County storm drain system after treatment to remove Volatile Organic Compounds (VOCs). The treatment consists of an air stripping tower. The average monthly flows are approximately 20 gallons per day (GPD). For the third quarter of 2008, the average flow was 16 GPD and a pH of 7.6 S.U. They monitor for 5 VOCs, Trichloroethylene (TCE), Vinyl Chloride, Methylene Chloride, Tetrachloroethylene, and Chloroform. For the third quarter of 2008, no VOC was above the detection level.

Plant Operation

The treatment system is being maintained by ENSAT while Environmental Consultant Services (ECS) does the compliance monitoring. The system does not require a licensed operator. ECS staff is at the site for 20-30 minutes per month for sampling. The system uses horizontal plates to allow air to strip the VOCs from the water. The system is sealed and can not be observed. Preventive maintenance for the system is scheduled through ENSAT; and the system has required no emergency repairs since installation. The system is equipped with local alarms to indicate problems. The system does not have emergency power. If a prolonged power outage occurred, the influent surge tank would overflow into the parking garage. According to ECS staff, the facility has generally performed well.

LABORATORY INSPECTION

PRESENT DURING INSPECTION:	Doug Frasier, Tim Incheck, David Bookbinder
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1. Do lab records include sampling date/time, analysis date/time, sample location, test method, test results, analyst's initials, instrument calibration and maintenance, and Certificate of Analysis? <input checked="" type="checkbox"/> Sampling Date/Time <input checked="" type="checkbox"/> Analysis Date/Time <input type="checkbox"/> Sample Location <input checked="" type="checkbox"/> Test Method <input checked="" type="checkbox"/> Test Results <input checked="" type="checkbox"/> Analyst's Initials <input type="checkbox"/> Instrument Calibration & Maintenance <input type="checkbox"/> Chain of Custody <input checked="" type="checkbox"/> Certificate of Analysis	
2. Are Discharge Monitoring Reports complete and correct? Month(s) reviewed: <u>July - September 2008</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Are sample location(s) according to permit requirements (after all treatment unless otherwise specified)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Are sample collection, preservation, and holding times appropriate; and is sampling equipment adequate?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Are grab and composite samples representative of the flow and the nature of the monitored activity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. If analysis is performed at another location, are shipping procedures adequate? List parameters and name & address of contract lab(s): • <u>Volatile Organics analyzed by Maryland Spectral Services</u> Baltimore Maryland Comments: Chain of Custody does not include temperature and pH upon receipt at the laboratory	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7. Is Laboratory equipment in proper operating range?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Are annual thermometer calibration(s) adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9. Is the laboratory grade water supply adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
10. Are analytical balance(s) adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11. Parameters evaluated during this inspection (attach checklists): <input checked="" type="checkbox"/> pH <input type="checkbox"/> Temperature <u>Comments:</u> DEQ staff discussed the pH procedure with Mr. Bookbinder. The pH meter is calibrated by ECS laboratory staff each day. No record of the pH meter calibration was available for review in the field. No record was available to show the pH meter thermistor has been compared to a NIST certified thermometer in the past year.	

Permit #	VA0090093
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EFFLUENT FIELD DATA:

Flow	MGD	Dissolved Oxygen	mg/L	TRC (Contact Tank)	mg/L
pH	S.U.	Temperature	°C	TRC (Final Effluent)	mg/L
Was a Sampling Inspection conducted? <input type="checkbox"/> Yes (see Sampling Inspection Report) <input type="checkbox"/> No					

CONDITION OF OUTFALL AND EFFLUENT CHARACTERISTICS:

1. Type of outfall:	<input type="checkbox"/> Shore based	<input type="checkbox"/> Submerged	Diffuser?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Are the outfall and supporting structures in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
3. Final Effluent (evidence of following problems):	<input type="checkbox"/> Sludge bar	<input type="checkbox"/> Grease			
	<input type="checkbox"/> Turbid effluent	<input type="checkbox"/> Visible foam	<input type="checkbox"/> Unusual color	<input type="checkbox"/> Oil sheen	
4. Is there a visible effluent plume in the receiving stream?	<input type="checkbox"/> Yes <input type="checkbox"/> No				
5. Receiving stream:	<input type="checkbox"/> No observed problems <input type="checkbox"/> Indication of problems (explain below)				
Comments: Effluent is discharged to Fairfax County storm drain system.					

REQUIRED CORRECTIVE ACTIONS:

1.	According to Standard Methods 18 th edition, Section 2550 (Temperature), Part B.1, "... Periodically check the thermometer against a precision thermometer certified by NIST." No record was provided to show the pH meter thermistor has been compared to a NIST certified thermometer.
2.	According to Standard Methods 18 th edition, Section 4500-H ⁺ , Part B.4.a, "the purpose of standardization is to adjust the response of the glass electrode to the instrument. When only occasional pH measurements are made, standardize the instrument before each use." DEQ requires the pH meter be calibrated at least daily. No records were available to show the pH meter had been calibrated on October 23, 2008.
3.	Samples must be preserved according to 40 CFR Part 136. Neither the certificate of analysis nor the chain of custody shows the temperature and pH of samples received by the laboratory.
ECS laboratory staff should provide a copy of the annual thermistor check and daily meter calibration to the field technicians.	

ATTACHMENT 11

Planning Statement

To: Douglas Frasier
From: Jennifer Carlson

Date: 14 July 2015
Subject: Planning Statement for John Marshall III Site
Permit Number: VA0090093

Information for Outfall 001:

Discharge Type:	industrial minor – groundwater dewatering
Discharge Flow:	average 30-day flow of 0.0003 MGD
Receiving Stream:	Old Courthouse Spring Branch, UT
Latitude / Longitude:	38° 55' 17.0" / -77° 13' 56.5"
Rivermile:	0.43
Streamcode:	1aXNW
Waterbody:	VAN-A11R
Water Quality Standards:	Class III, Section 9
Drainage Area:	<0.01 square miles

1. Please provide water quality monitoring information for the receiving stream segment. If there is not monitoring information for the receiving stream segment, please provide information on the nearest downstream monitoring station, including how far downstream the monitoring station is from the outfall.

This facility discharges into an unnamed tributary to Old Courthouse Spring Branch (storm sewer), which has not been monitored or assessed. There is a biological monitoring station, 1aOCS000.43, located on Old Courthouse Spring Branch, at Laurel Hill Road, approximately 2.1 miles downstream of Outfall 001. Routine ambient water quality monitoring was not conducted in conjunction with the biological sampling. The biological monitoring found benthic macroinvertebrate impairments, resulting in an impaired classification for the aquatic life use. The fish consumption, recreation, and wildlife uses were not assessed.

There is a downstream DEQ ambient monitoring station located on Wolftrap Creek. Station 1aWOT000.92 is located at the Route 702 bridge crossing, approximately 4.3 miles downstream of Outfall 001. The following is the water quality summary for this segment of Wolftrap Creek, as taken from the 2012 Integrated Report:

Class III, Section 9.

DEQ monitoring station located in this segment of Wolftrap Creek:

- *Ambient water quality monitoring station 1aWOT000.92, at Route 702*

E. coli monitoring finds a bacterial impairment, resulting in an impaired classification for the recreation use. This impairment is nested within the downstream completed bacteria TMDL for Difficult Run.

The aquatic life is considered fully supporting. However, from a previous assessment, citizen monitoring stations found a medium probability of adverse conditions for biota, resulting in an observed effect for the aquatic life use. This observed effect will remain.

The wildlife use is considered fully supporting. The fish consumption use was not assessed.

2. Does this facility discharge to a stream segment on the 303(d) list? If yes, please fill out Table A.

No.

3. Are there any downstream 303(d) listed impairments that are relevant to this discharge? If yes, please fill out Table B.

Yes.

Table B. Information on Downstream 303(d) Impairments and TMDLs

Waterbody Name	Impaired Use	Cause	Distance From Outfall (miles)	TMDL completed	WLA	Basis for WLA	TMDL Schedule
Impairment Information in the 2012 Integrated Report							
Old Courthouse Spring Branch	Aquatic Life	Benthic Macroinvertebrates	0.4	No	--	--	2022
Wolftrap Creek	Recreation	<i>E. coli</i>	2.5	Difficult Run Bacteria 11/07/2008	None	Not expected to discharge pollutant	N/A
Difficult Run	Fish Consumption	PCBs	5.5	No	--	--	2018
		Heptachlor epoxide	6.6	No	--	--	2018
	Aquatic Life	Benthic Macroinvertebrates	6.6	Difficult Run Benthic 11/07/2008	None	Not expected to discharge pollutant	N/A

4. Is there monitoring or other conditions that Planning/Assessment needs in the permit?

Old Courthouse Spring Branch, which is located approximately 0.43 miles downstream from Outfall 001 is listed as impaired for benthic macroinvertebrates with a TMDL in place. Because this industrial facility is located within five miles upstream from a benthic impairment, it is a candidate for nutrient monitoring. DEQ staff has concluded that nutrient monitoring will not be required of this facility, as the intermittent discharge results from groundwater dewatering and is not expected to be a source of nutrients.

Difficult Run is listed with a PCB impairment, approximately 5.5 miles downstream of Outfall 001. In support for the PCB TMDL that is scheduled for development by 2018, this industrial facility is a candidate for PCB monitoring. Low-level PCB analysis uses EPA Method 1668, which is capable of detecting low-level concentrations for all 209 PCB congeners. DEQ staff has concluded that low-level PCB monitoring is not applicable for this facility and such monitoring will not be requested.

There is a completed downstream TMDL for the aquatic life use impairment for the Chesapeake Bay. However, the Bay TMDL and the WLAs contained within the TMDL are not addressed in this planning statement.

5. Fact Sheet Requirements – Please provide information regarding any drinking water intakes located within a 5 mile radius of the discharge point.

There are no public water supply intakes located within 5 miles of this discharge.

ATTACHMENT 12

Water Quality Criteria / Wasteload Allocation Analysis

FRESHWATER WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: John Marshall Site III

Permit No.: VA0090093

Receiving Stream: Old Courthouse Spring Branch, UT

Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information

Mean Hardness (as CaCO3) = mg/L
 90% Temperature (Annual) = deg C
 90% Temperature (Wet season) = deg C
 90% Maximum pH = SU
 10% Maximum pH = SU
 Tier Designation (1 or 2) = 1
 Public Water Supply (PWS) Y/N? = n
 Trout Present Y/N? = n
 Early Life Stages Present Y/N? = n

Stream Flows

1Q10 (Annual) = 0 MGD
 7Q10 (Annual) = 0 MGD
 30Q10 (Annual) = 0 MGD
 1Q10 (Wet season) = 0 MGD
 30Q10 (Wet season) = 0 MGD
 30Q5 = 0 MGD
 Harmonic Mean = 0 MGD

Mixing Information

Annual - 1Q10 Mix = 100 %
 - 7Q10 Mix = 100 %
 - 30Q10 Mix = 100 %
 Wet Season - 1Q10 Mix = 100 %
 - 30Q10 Mix = 100 %

Effluent Information

Mean Hardness (as CaCO3) = 50 mg/L
 90% Temp (Annual) = 19.4 deg C
 90% Temp (Wet season) = 14.2 deg C
 90% Maximum pH = 7.6 SU
 10% Maximum pH = SU
 Discharge Flow = 0.1224 MGD

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenaphthene	0	--	--	na	9.9E+02	--	--	na	9.9E+02	--	--	--	--	--	--	--	--	--	--	na	9.9E+02
Acrolein	0	--	--	na	9.3E+00	--	--	na	9.3E+00	--	--	--	--	--	--	--	--	--	--	na	9.3E+00
Acrylonitrile ^C	0	--	--	na	2.5E+00	--	--	na	2.5E+00	--	--	--	--	--	--	--	--	--	--	na	2.5E+00
Aldrin ^C	0	3.0E+00	--	na	5.0E-04	3.0E+00	--	na	5.0E-04	--	--	--	--	--	--	--	--	3.0E+00	--	na	5.0E-04
Ammonia-N (mg/l) (Yearly)	0	1.70E+01	2.90E+00	na	--	1.70E+01	2.90E+00	na	--	--	--	--	--	--	--	--	--	1.70E+01	2.90E+00	na	--
Ammonia-N (mg/l) (High Flow)	0	1.70E+01	4.06E+00	na	--	1.70E+01	4.06E+00	na	--	--	--	--	--	--	--	--	--	1.70E+01	4.06E+00	na	--
Anthracene	0	--	--	na	4.0E+04	--	--	na	4.0E+04	--	--	--	--	--	--	--	--	--	--	na	4.0E+04
Antimony	0	--	--	na	6.4E+02	--	--	na	6.4E+02	--	--	--	--	--	--	--	--	--	--	na	6.4E+02
Arsenic	0	3.4E+02	1.5E+02	na	--	3.4E+02	1.5E+02	na	--	--	--	--	--	--	--	--	--	3.4E+02	1.5E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene ^C	0	--	--	na	5.1E+02	--	--	na	5.1E+02	--	--	--	--	--	--	--	--	--	--	na	5.1E+02
Benzidine ^C	0	--	--	na	2.0E-03	--	--	na	2.0E-03	--	--	--	--	--	--	--	--	--	--	na	2.0E-03
Benzo (a) anthracene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (b) fluoranthene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (k) fluoranthene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Benzo (a) pyrene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Bis(2-Chloroethyl) Ether ^C	0	--	--	na	5.3E+00	--	--	na	5.3E+00	--	--	--	--	--	--	--	--	--	--	na	5.3E+00
Bis(2-Chloroisopropyl) Ether	0	--	--	na	6.5E+04	--	--	na	6.5E+04	--	--	--	--	--	--	--	--	--	--	na	6.5E+04
Bis 2-Ethylhexyl Phthalate ^C	0	--	--	na	2.2E+01	--	--	na	2.2E+01	--	--	--	--	--	--	--	--	--	--	na	2.2E+01
Bromoform ^C	0	--	--	na	1.4E+03	--	--	na	1.4E+03	--	--	--	--	--	--	--	--	--	--	na	1.4E+03
Butylbenzylphthalate	0	--	--	na	1.9E+03	--	--	na	1.9E+03	--	--	--	--	--	--	--	--	--	--	na	1.9E+03
Cadmium	0	1.8E+00	6.6E-01	na	--	1.8E+00	6.6E-01	na	--	--	--	--	--	--	--	--	--	1.8E+00	6.6E-01	na	--
Carbon Tetrachloride ^C	0	--	--	na	1.6E+01	--	--	na	1.6E+01	--	--	--	--	--	--	--	--	--	--	na	1.6E+01
Chlordane ^C	0	2.4E+00	4.3E-03	na	8.1E-03	2.4E+00	4.3E-03	na	8.1E-03	--	--	--	--	--	--	--	--	2.4E+00	4.3E-03	na	8.1E-03
Chloride	0	8.6E+05	2.3E+05	na	--	8.6E+05	2.3E+05	na	--	--	--	--	--	--	--	--	--	8.6E+05	2.3E+05	na	--
TRC	0	1.9E+01	1.1E+01	na	--	1.9E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.9E+01	1.1E+01	na	--
Chlorobenzene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane ^C	0	--	--	na	1.3E+02	--	--	na	1.3E+02	--	--	--	--	--	--	--	--	--	--	na	1.3E+02
Chloroform	0	--	--	na	1.1E+04	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
2-Chloronaphthalene	0	--	--	na	1.6E+03	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03
2-Chlorophenol	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	8.3E-02	4.1E-02	na	--	--	--	--	--	--	--	--	--	8.3E-02	4.1E-02	na	--
Chromium III	0	3.2E+02	4.2E+01	na	--	3.2E+02	4.2E+01	na	--	--	--	--	--	--	--	--	--	3.2E+02	4.2E+01	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	1.6E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.6E+01	1.1E+01	na	--
Chromium, Total	0	--	--	1.0E+02	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene ^C	0	--	--	na	1.8E-02	--	--	na	1.8E-02	--	--	--	--	--	--	--	--	--	--	na	1.8E-02
Copper	0	7.0E+00	5.0E+00	na	--	7.0E+00	5.0E+00	na	--	--	--	--	--	--	--	--	--	7.0E+00	5.0E+00	na	--
Cyanide, Free	0	2.2E+01	5.2E+00	na	1.6E+04	2.2E+01	5.2E+00	na	1.6E+04	--	--	--	--	--	--	--	--	2.2E+01	5.2E+00	na	1.6E+04
DDD ^C	0	--	--	na	3.1E-03	--	--	na	3.1E-03	--	--	--	--	--	--	--	--	--	--	na	3.1E-03
DDE ^C	0	--	--	na	2.2E-03	--	--	na	2.2E-03	--	--	--	--	--	--	--	--	--	--	na	2.2E-03
DDT ^C	0	1.1E+00	1.0E-03	na	2.2E-03	1.1E+00	1.0E-03	na	2.2E-03	--	--	--	--	--	--	--	--	1.1E+00	1.0E-03	na	2.2E-03
Demeton	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Diazinon	0	1.7E-01	1.7E-01	na	--	1.7E-01	1.7E-01	na	--	--	--	--	--	--	--	--	--	1.7E-01	1.7E-01	na	--
Dibenz(a,h)anthracene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
1,2-Dichlorobenzene	0	--	--	na	1.3E+03	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	--	--	na	1.3E+03
1,3-Dichlorobenzene	0	--	--	na	9.6E+02	--	--	na	9.6E+02	--	--	--	--	--	--	--	--	--	--	na	9.6E+02
1,4-Dichlorobenzene	0	--	--	na	1.9E+02	--	--	na	1.9E+02	--	--	--	--	--	--	--	--	--	--	na	1.9E+02
3,3-Dichlorobenzidine ^C	0	--	--	na	2.8E-01	--	--	na	2.8E-01	--	--	--	--	--	--	--	--	--	--	na	2.8E-01
Dichlorobromomethane ^C	0	--	--	na	1.7E+02	--	--	na	1.7E+02	--	--	--	--	--	--	--	--	--	--	na	1.7E+02
1,2-Dichloroethane ^C	0	--	--	na	3.7E+02	--	--	na	3.7E+02	--	--	--	--	--	--	--	--	--	--	na	3.7E+02
1,1-Dichloroethylene	0	--	--	na	7.1E+03	--	--	na	7.1E+03	--	--	--	--	--	--	--	--	--	--	na	7.1E+03
1,2-trans-dichloroethylene	0	--	--	na	1.0E+04	--	--	na	1.0E+04	--	--	--	--	--	--	--	--	--	--	na	1.0E+04
2,4-Dichlorophenol	0	--	--	na	2.9E+02	--	--	na	2.9E+02	--	--	--	--	--	--	--	--	--	--	na	2.9E+02
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane ^C	0	--	--	na	1.5E+02	--	--	na	1.5E+02	--	--	--	--	--	--	--	--	--	--	na	1.5E+02
1,3-Dichloropropene ^C	0	--	--	na	2.1E+02	--	--	na	2.1E+02	--	--	--	--	--	--	--	--	--	--	na	2.1E+02
Dieldrin ^C	0	2.4E-01	5.6E-02	na	5.4E-04	2.4E-01	5.6E-02	na	5.4E-04	--	--	--	--	--	--	--	--	2.4E-01	5.6E-02	na	5.4E-04
Diethyl Phthalate	0	--	--	na	4.4E+04	--	--	na	4.4E+04	--	--	--	--	--	--	--	--	--	--	na	4.4E+04
2,4-Dimethylphenol	0	--	--	na	8.5E+02	--	--	na	8.5E+02	--	--	--	--	--	--	--	--	--	--	na	8.5E+02
Dimethyl Phthalate	0	--	--	na	1.1E+06	--	--	na	1.1E+06	--	--	--	--	--	--	--	--	--	--	na	1.1E+06
Di-n-Butyl Phthalate	0	--	--	na	4.5E+03	--	--	na	4.5E+03	--	--	--	--	--	--	--	--	--	--	na	4.5E+03
2,4 Dinitrophenol	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
2-Methyl-4,6-Dinitrophenol	0	--	--	na	2.8E+02	--	--	na	2.8E+02	--	--	--	--	--	--	--	--	--	--	na	2.8E+02
2,4-Dinitrotoluene ^C	0	--	--	na	3.4E+01	--	--	na	3.4E+01	--	--	--	--	--	--	--	--	--	--	na	3.4E+01
Dioxin 2,3,7,8- tetrachlorodibenzo-p-dioxin	0	--	--	na	5.1E-08	--	--	na	5.1E-08	--	--	--	--	--	--	--	--	--	--	na	5.1E-08
1,2-Diphenylhydrazine ^C	0	--	--	na	2.0E+00	--	--	na	2.0E+00	--	--	--	--	--	--	--	--	--	--	na	2.0E+00
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	8.9E+01	2.2E-01	5.6E-02	na	8.9E+01	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	8.9E+01
Alpha + Beta Endosulfan	0	2.2E-01	5.6E-02	--	--	2.2E-01	5.6E-02	--	--	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	--	--
Endosulfan Sulfate	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Endrin	0	8.6E-02	3.6E-02	na	6.0E-02	8.6E-02	3.6E-02	na	6.0E-02	--	--	--	--	--	--	--	--	8.6E-02	3.6E-02	na	6.0E-02
Endrin Aldehyde	0	--	--	na	3.0E-01	--	--	na	3.0E-01	--	--	--	--	--	--	--	--	--	--	na	3.0E-01

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.1E+03	--	--	na	2.1E+03	--	--	--	--	--	--	--	--	--	--	na	2.1E+03
Fluoranthene	0	--	--	na	1.4E+02	--	--	na	1.4E+02	--	--	--	--	--	--	--	--	--	--	na	1.4E+02
Fluorene	0	--	--	na	5.3E+03	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	1.0E-02	na	--	--	--	--	--	--	--	--	--	--	1.0E-02	na	--
Heptachlor ^C	0	5.2E-01	3.8E-03	na	7.9E-04	5.2E-01	3.8E-03	na	7.9E-04	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	7.9E-04
Heptachlor Epoxide ^C	0	5.2E-01	3.8E-03	na	3.9E-04	5.2E-01	3.8E-03	na	3.9E-04	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	3.9E-04
Hexachlorobenzene ^C	0	--	--	na	2.9E-03	--	--	na	2.9E-03	--	--	--	--	--	--	--	--	--	--	na	2.9E-03
Hexachlorobutadiene ^C	0	--	--	na	1.8E+02	--	--	na	1.8E+02	--	--	--	--	--	--	--	--	--	--	na	1.8E+02
Hexachlorocyclohexane Alpha-BHC ^C	0	--	--	na	4.9E-02	--	--	na	4.9E-02	--	--	--	--	--	--	--	--	--	--	na	4.9E-02
Hexachlorocyclohexane Beta-BHC ^C	0	--	--	na	1.7E-01	--	--	na	1.7E-01	--	--	--	--	--	--	--	--	--	--	na	1.7E-01
Hexachlorocyclohexane Gamma-BHC ^C (Lindane)	0	9.5E-01	na	na	1.8E+00	9.5E-01	--	na	1.8E+00	--	--	--	--	--	--	--	--	9.5E-01	--	na	1.8E+00
Hexachlorocyclopentadiene	0	--	--	na	1.1E+03	--	--	na	1.1E+03	--	--	--	--	--	--	--	--	--	--	na	1.1E+03
Hexachloroethane ^C	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	--	--	na	3.3E+01
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	2.0E+00	na	--	--	--	--	--	--	--	--	--	--	2.0E+00	na	--
Indeno (1,2,3-cd) pyrene ^C	0	--	--	na	1.8E-01	--	--	na	1.8E-01	--	--	--	--	--	--	--	--	--	--	na	1.8E-01
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Isophorone ^C	0	--	--	na	9.6E+03	--	--	na	9.6E+03	--	--	--	--	--	--	--	--	--	--	na	9.6E+03
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Lead	0	4.9E+01	5.6E+00	na	--	4.9E+01	5.6E+00	na	--	--	--	--	--	--	--	--	--	4.9E+01	5.6E+00	na	--
Malathion	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	--	--	1.4E+00	7.7E-01	--	--	--	--	--	--	--	--	--	--	1.4E+00	7.7E-01	--	--
Methyl Bromide	0	--	--	na	1.5E+03	--	--	na	1.5E+03	--	--	--	--	--	--	--	--	--	--	na	1.5E+03
Methylene Chloride ^C	0	--	--	na	5.9E+03	--	--	na	5.9E+03	--	--	--	--	--	--	--	--	--	--	na	5.9E+03
Methoxychlor	0	--	3.0E-02	na	--	--	3.0E-02	na	--	--	--	--	--	--	--	--	--	--	3.0E-02	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Nickel	0	1.0E+02	1.1E+01	na	4.6E+03	1.0E+02	1.1E+01	na	4.6E+03	--	--	--	--	--	--	--	--	1.0E+02	1.1E+01	na	4.6E+03
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Nitrobenzene	0	--	--	na	6.9E+02	--	--	na	6.9E+02	--	--	--	--	--	--	--	--	--	--	na	6.9E+02
N-Nitrosodimethylamine ^C	0	--	--	na	3.0E+01	--	--	na	3.0E+01	--	--	--	--	--	--	--	--	--	--	na	3.0E+01
N-Nitrosodiphenylamine ^C	0	--	--	na	6.0E+01	--	--	na	6.0E+01	--	--	--	--	--	--	--	--	--	--	na	6.0E+01
N-Nitrosodi-n-propylamine ^C	0	--	--	na	5.1E+00	--	--	na	5.1E+00	--	--	--	--	--	--	--	--	--	--	na	5.1E+00
Nonylphenol	0	2.8E+01	6.6E+00	--	--	2.8E+01	6.6E+00	na	--	--	--	--	--	--	--	--	--	2.8E+01	6.6E+00	na	--
Parathion	0	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	--	--	--	--	--	--	--	--	6.5E-02	1.3E-02	na	--
PCB Total ^C	0	--	1.4E-02	na	6.4E-04	--	1.4E-02	na	6.4E-04	--	--	--	--	--	--	--	--	--	1.4E-02	na	6.4E-04
Pentachlorophenol ^C	0	7.7E-03	5.9E-03	na	3.0E+01	7.7E-03	5.9E-03	na	3.0E+01	--	--	--	--	--	--	--	--	7.7E-03	5.9E-03	na	3.0E+01
Phenol	0	--	--	na	8.6E+05	--	--	na	8.6E+05	--	--	--	--	--	--	--	--	--	--	na	8.6E+05
Pyrene	0	--	--	na	4.0E+03	--	--	na	4.0E+03	--	--	--	--	--	--	--	--	--	--	na	4.0E+03
Radionuclides Gross Alpha Activity (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	4.0E+00	--	--	--	--	--	--	--	--	--	--	na	4.0E+00
Radium 226 + 228 (pCi/L)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Uranium (ug/l)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Selenium, Total Recoverable	0	2.0E+01	5.0E+00	na	4.2E+03	2.0E+01	5.0E+00	na	4.2E+03	--	--	--	--	--	--	--	--	2.0E+01	5.0E+00	na	4.2E+03
Silver	0	1.0E+00	--	na	--	1.0E+00	--	na	--	--	--	--	--	--	--	--	--	1.0E+00	--	na	--
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,1,2,2-Tetrachloroethane ^C	0	--	--	na	4.0E+01	--	--	na	4.0E+01	--	--	--	--	--	--	--	--	--	--	na	4.0E+01
Tetrachloroethylene ^C	0	--	--	na	3.3E+01	--	--	na	3.3E+01	--	--	--	--	--	--	--	--	--	--	na	3.3E+01
Thallium	0	--	--	na	4.7E-01	--	--	na	4.7E-01	--	--	--	--	--	--	--	--	--	--	na	4.7E-01
Toluene	0	--	--	na	6.0E+03	--	--	na	6.0E+03	--	--	--	--	--	--	--	--	--	--	na	6.0E+03
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Toxaphene ^C	0	7.3E-01	2.0E-04	na	2.8E-03	7.3E-01	2.0E-04	na	2.8E-03	--	--	--	--	--	--	--	--	7.3E-01	2.0E-04	na	2.8E-03
Tributyltin	0	4.6E-01	7.2E-02	na	--	4.6E-01	7.2E-02	na	--	--	--	--	--	--	--	--	--	4.6E-01	7.2E-02	na	--
1,2,4-Trichlorobenzene	0	--	--	na	7.0E+01	--	--	na	7.0E+01	--	--	--	--	--	--	--	--	--	--	na	7.0E+01
1,1,2-Trichloroethane ^C	0	--	--	na	1.6E+02	--	--	na	1.6E+02	--	--	--	--	--	--	--	--	--	--	na	1.6E+02
Trichloroethylene ^C	0	--	--	na	3.0E+02	--	--	na	3.0E+02	--	--	--	--	--	--	--	--	--	--	na	3.0E+02
2,4,6-Trichlorophenol ^C	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	--	--	na	2.4E+01
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Vinyl Chloride ^C	0	--	--	na	2.4E+01	--	--	na	2.4E+01	--	--	--	--	--	--	--	--	--	--	na	2.4E+01
Zinc	0	6.5E+01	6.6E+01	na	2.6E+04	6.5E+01	6.6E+01	na	2.6E+04	--	--	--	--	--	--	--	--	6.5E+01	6.6E+01	na	2.6E+04

Notes:

- All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
- Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
- Metals measured as Dissolved, unless specified otherwise
- "C" indicates a carcinogenic parameter
- Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information.
Antidegradation WLAs are based upon a complete mix.
- Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
= (0.1(WQC - background conc.) + background conc.) for human health
- WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens and
Harmonic Mean for Carcinogens. To apply mixing ratios from a model set the stream flow equal to (mixing ratio - 1), effluent flow equal to 1 and 100% mix.

Metal	Target Value (SSTV)
Antimony	6.4E+02
Arsenic	9.0E+01
Barium	na
Cadmium	3.9E-01
Chromium III	2.5E+01
Chromium VI	6.4E+00
Copper	2.8E+00
Iron	na
Lead	3.4E+00
Manganese	na
Mercury	4.6E-01
Nickel	6.8E+00
Selenium	3.0E+00
Silver	4.2E-01
Zinc	2.6E+01

Note: do not use QL's lower than the minimum QL's provided in agency guidance

ATTACHMENT 13

June 2010 – March 2014 Effluent Data

DMR QA/QC

Permit #:VA0090093	Facility:John Marshall III Site
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Rec'd	Parameter Description	QTY AVG	Lim Avg	QTY MAX	Lim Max	CONC MIN	Lim Min	CONC AVG	Lim Avg	CONC MAX	Lim Max
09-Apr-2010	CHLOROFORM (AS CHCL3)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
07-Jul-2010	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	30	NL
21-Sep-2010	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	NL
27-Dec-2010	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
21-Mar-2011	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
10-Jun-2011	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	NL
28-Sep-2011	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
29-Mar-2012	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	NL
01-Oct-2012	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	NL
03-Apr-2013	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	NL
15-Oct-2013	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	NL
02-Apr-2014	CIS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	NL
09-Apr-2010	FLOW	0.000326	NL	0.000652	NL	NULL	*****	NULL	*****	NULL	*****
07-Jul-2010	FLOW	0.000761	NL	0.001522	NL	NULL	*****	NULL	*****	NULL	*****
21-Sep-2010	FLOW	0.000020	NL	0.000040	NL	NULL	*****	NULL	*****	NULL	*****
27-Dec-2010	FLOW	0.000107	NL	0.000214	NL	NULL	*****	NULL	*****	NULL	*****
21-Mar-2011	FLOW	0.000015	NL	0.000030	NL	NULL	*****	NULL	*****	NULL	*****
10-Jun-2011	FLOW	0.000016	NL	0.000032	NL	NULL	*****	NULL	*****	NULL	*****
28-Sep-2011	FLOW	0.000150	NL	0.000300	NL	NULL	*****	NULL	*****	NULL	*****
29-Mar-2012	FLOW	0.0001	NL	0.0002	NL	NULL	*****	NULL	*****	NULL	*****
01-Oct-2012	FLOW	0.00004	NL	0.0001	NL	NULL	*****	NULL	*****	NULL	*****
03-Apr-2013	FLOW	0.00008	NL	0.0001	NL	NULL	*****	NULL	*****	NULL	*****
15-Oct-2013	FLOW	0.00006	NL	0.0002	NL	NULL	*****	NULL	*****	NULL	*****
02-Apr-2014	FLOW	0.000015	NL	0.00003	NL	NULL	*****	NULL	*****	NULL	*****
09-Apr-2010	METHYLENE CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
09-Apr-2010	pH	NULL	*****	NULL	*****	6.72	6.0	NULL	*****	6.72	9.0
07-Jul-2010	pH	NULL	*****	NULL	*****	6.92	6.0	NULL	*****	6.92	9.0
21-Sep-2010	pH	NULL	*****	NULL	*****	6.85	6.0	NULL	*****	6.85	9.0
27-Dec-2010	pH	NULL	*****	NULL	*****	7.34	6.0	NULL	*****	7.34	9.0
21-Mar-2011	pH	NULL	*****	NULL	*****	7.12	6.0	NULL	*****	7.12	9.0
10-Jun-2011	pH	NULL	*****	NULL	*****	7.21	6.0	NULL	*****	7.21	9.0
28-Sep-2011	pH	NULL	*****	NULL	*****	6.83	6.0	NULL	*****	6.83	9.0
29-Mar-2012	pH	NULL	*****	NULL	*****	7.4	6.0	NULL	*****	7.4	9.0
01-Oct-2012	pH	NULL	*****	NULL	*****	7	6.0	NULL	*****	7	9.0
03-Apr-2013	pH	NULL	*****	NULL	*****	6.42	6.0	NULL	*****	6.42	9.0
15-Oct-2013	pH	NULL	*****	NULL	*****	8.0	6.0	NULL	*****	8.0	9.0
02-Apr-2014	pH	NULL	*****	NULL	*****	7.6	6.0	NULL	*****	7.6	9.0

09-Apr-2010	TETRACHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
07-Jul-2010	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	10000
21-Sep-2010	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	10000
27-Dec-2010	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	10000
21-Mar-2011	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	10000
10-Jun-2011	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	10000
28-Sep-2011	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	10000
29-Mar-2012	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	10000
01-Oct-2012	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	10000
03-Apr-2013	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	10000
15-Oct-2013	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	10000
02-Apr-2014	TRANS-1,2-DICHLOROETHYLENE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	10000
09-Apr-2010	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
07-Jul-2010	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	132	300
21-Sep-2010	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	300
27-Dec-2010	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	300
21-Mar-2011	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	300
10-Jun-2011	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	300
28-Sep-2011	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	300
29-Mar-2012	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	300
01-Oct-2012	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	300
03-Apr-2013	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	300
15-Oct-2013	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	300
02-Apr-2014	TRICHLOROETHYLENE (TCE) (79016)	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	300
09-Apr-2010	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	NL
07-Jul-2010	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	24
21-Sep-2010	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	24
27-Dec-2010	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	24
21-Mar-2011	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	24
10-Jun-2011	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5.0	24
28-Sep-2011	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<2.0	24
29-Mar-2012	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	24
01-Oct-2012	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	24
03-Apr-2013	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<5	24
15-Oct-2013	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	24
02-Apr-2014	VINYL CHLORIDE	NULL	*****	NULL	*****	NULL	*****	NULL	*****	<1	24

ATTACHMENT 14

Public Notice

Public Notice – Environmental Permit

PURPOSE OF NOTICE: To seek public comment on a draft permit from the Department of Environmental Quality that will allow the release of groundwater into a water body in Fairfax County, Virginia.

PUBLIC COMMENT PERIOD: September 19, 2015 to October 19, 2015

PERMIT NAME: Virginia Pollutant Discharge Elimination System Permit – Groundwater issued by DEQ, under the authority of the State Water Control Board

APPLICANT NAME, ADDRESS AND PERMIT NUMBER: Marshall Property, LLC
8251 Greensboro Drive, B100, McLean, VA 22102
VA0090093

NAME AND ADDRESS OF FACILITY: John Marshall III Site
8285 Greensboro Drive, McLean, VA 22102

PROJECT DESCRIPTION: Marshall Property, LLC has applied for a reissuance of a permit for the private John Marshall III Site. The applicant proposes to release groundwater from a below-grade office building parking garage dewatering system at a varied rate, dependent upon groundwater intrusion, into a water body. There is no sludge treated or generated at this facility. The facility proposes to release the groundwater in an unnamed tributary to Old Courthouse Spring Branch in the Potomac River watershed. A watershed is the land area drained by a river and its incoming streams. The permit will limit the following pollutants to amounts that protect water quality: pH, vinyl chloride, trans-1,2 dichloroethylene and trichloroethylene. The facility will also be required to monitor for cis-1,2 dichloroethylene and flow.

HOW TO COMMENT AND/OR REQUEST A PUBLIC HEARING: DEQ accepts comments and requests for public hearing by hand-delivery, e-mail, fax or postal mail. All comments and requests must be in writing and be received by DEQ during the comment period. Submittals must include the names, mailing addresses and telephone numbers of the commenter/requester and of all persons represented by the commenter/requester. A request for public hearing must also include: 1) The reason why a public hearing is requested. 2) A brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit. 3) Specific references, where possible, to terms and conditions of the permit with suggested revisions. A public hearing may be held, including another comment period, if public response is significant, based on individual requests for a public hearing, and there are substantial, disputed issues relevant to the permit.

CONTACT FOR PUBLIC COMMENTS, DOCUMENT REQUESTS AND ADDITIONAL INFORMATION: The public may review the draft permit and application at the DEQ-Northern Regional Office by appointment, or may request electronic copies of the draft permit and fact sheet.

Name: Douglas Frasier
Address: DEQ-Northern Regional Office, 13901 Crown Court, Woodbridge, VA 22193
Phone: (703) 583-3873 E-mail: Douglas.Frasier@deq.virginia.gov Fax: (703) 583-3821